



PRIVACY AND COMMERCIAL COMMUNICATIONS POLICY FOR CANDIDATES

Effective date: May 22nd, 2018

1. PERSONAL DATA

1. In compliance with the provisions of the applicable data protection legislation, JOB DIGITAL NETWORKS, S.L. (hereinafter, "**CornerJob**") informs candidates (hereinafter, "**Candidates**") that the personal data they provide us with when they register at CornerJob, as well as the data that CornerJob accesses as a result of their browsing, enquiries or requests, all through the website <http://www.cornerjob.com> (hereinafter the "**Website**") and in **CornerJob** mobile applications (hereinafter the "**Applications**"), shall be included in a file for which CornerJob is the data controller.
2. By registering on the Website and/or the Applications, Candidates declare they have read and expressly accepted this Privacy Policy, and give their unequivocal and express consent to the processing of their personal data in accordance with the informed purposes and services provided by CornerJob, as well as the transfer of their personal data to third parties for the performance of the service, i.e. company users who use CornerJob's services to search for and select personnel (hereinafter, "**Companies**"), as well as to CornerJob Group entities.

2. EXERCISING RIGHTS

1. Candidates may exercise their rights to access, rectify, delete and port such data, and to restrict or oppose the processing thereof, by contacting JOB DIGITAL NETWORKS, S.L., CIF (Company Tax Code) No. B-66583907, at Edifici Palau de Mar, Plaça Pau Vila nº 1, Planta primera Sector AD, 08039 Barcelona, under the terms established in the regulations on personal data protection and other applicable implementing regulations. For more information on the content of these rights, please refer to Annex 1 to this Privacy and Commercial Communications Policy.
2. For convenience, and without prejudice to the need to comply with certain formal requirements established in the aforementioned regulations, CornerJob offers Candidates the possibility of exercising the aforementioned rights by email: gdpr@cornerjob.com.
3. If Candidates believe that their rights have not been duly respected, they have the right to file a complaint with the Spanish Data Protection Agency.

3. PURPOSES OF DATA COLLECTION

1. The purposes for which CornerJob collects the data of Candidates are as follows:
 - (i) To management and monitor Candidates' accounts at CornerJob.



- (ii) To manage the selection processes that the Candidate accesses through CornerJob.
- (iii) To receive and send CVs or candidate user profile data to companies.
- (iv) To manage and monitor Candidates' compliance with the terms and conditions of our application and their account.
- (v) To keep Candidates informed by sending notifications, including push notifications (whose content shall relate mainly to job offers and job alerts, updates, new features, troubleshooting, downtime or low use, detection and prevention of errors and general compliance with the terms and conditions).
- (vi) To regularly send, by any means, including email or equivalent means of electronic communication (including commercial communications), information relating to CornerJob's services, including suggestions and job alerts, CornerJob newsletters, studies and reports on the sector and, in general, any information relating to employment.

In order to ensure that this information and commercial communications match Candidates' interests as closely as possible, CornerJob may use statistical techniques to profile and segment their data.

In any case, Candidates can modify their preferences regarding the sending of push notifications or commercial communications, or disable them completely, in the user area. Please note that even if Candidates choose not to subscribe to or to unsubscribe from promotional emails or newsletters, we may still need to contact them regarding important non-commercial information.

- (vii) In the event that Candidates participate in the chat forum with Companies, the information, data and documents that Candidates share and their profile data shall be available to these Companies.
2. CornerJob shall request the data strictly necessary to comply with the purpose of the service, such as name, address, photograph, telephone number, email, education, profession, professional experience, languages and other necessary data. The obligation or otherwise to provide data shall be expressly stated. CornerJob offers Candidates the opportunity to find out, quickly, personally and free of charge, about job offers and/or professionals best suited to the user, through its Applications. To do this, Candidates must select geographical areas to find jobs closest to their location.
 3. We also use Candidates' information, including information shared in the chat forum with companies that advertise their jobs at CornerJob, to complete Candidate profiles and to review, research and analyse ways to improve our services. We may also collect and analyse their data to monitor, maintain and improve our services and activities.



4. We perform in-house analysis (statistical and otherwise) of the information we collect about Candidates (including usage data, device data, submission data, question and answer data, and information about HTML tags) to analyse and measure Candidate behaviour and trends, and to monitor and improve our Services, including to help us evaluate or design new features for them. In order to personalize information about Candidates and commercial communications as much as possible, CornerJob may use statistical techniques to create user profiles and segment data.
5. We may also use Candidates' information for internal purposes in order to keep our services operational and secure, such as tests, troubleshooting, prevention of abusive activities (such as fraud, spam and phishing activities) and to improve the service and for research and development purposes.
6. As detailed in our General Conditions of Use, if Users connect their CornerJob account to another account they have on a social media or third party platform, we may use the information that Users provide us with through such social media or third party platforms and that these have made available to CornerJob, all in accordance with the privacy policy and other aspects that apply to these social media accounts or third party platforms.
7. If Candidates do not wish to receive this information and marketing communications, whatever the channel used for this purpose, they may communicate their decision free of charge through the means indicated above to exercise their rights, or by sending an email to the following address: gdpr@cornerjob.com. Your consent to receive information is always revocable, without retroactive effect.

4. DATA RECIPIENTS

1. Use of the Website and/or Applications provides Candidates with access to job offers in other countries where any of the CornerJob Group entities (hereinafter, "CornerJob Group Entities") operate and allows Companies to search for Candidates available at any time in any of the countries where any of the CornerJob Group Entities operate, including those that do not offer a degree of protection on a similar level to that of European data protection regulations.
2. For this purpose, CornerJob must be able to communicate Candidates' personal data to the CornerJob Group Entities, whose identifying data are included in Annex 2 to this Privacy and Commercial Communications Policy, and which may provide Candidates with access to the offers available in each of the markets in which these entities operate, as well as display Candidate profiles in searches carried out by the Companies in each of the markets in which these entities operate.
3. Consent for the communication of personal data may be revoked at any time, although it shall not have a retroactive effect and shall mean that Candidates may not continue to make use of the services and activities that are available at any time on the Website and in the Applications.



4. In addition, Candidates' personal data shall be made available to the service providers that manage our platform, including the cloud computing system and any possible outsourcing to third party providers. Outsourced providers shall comply at all times with the conditions laid down in the applicable data protection legislation, including those relating to international data transfers outside the EU.

No further data communications are envisaged, unless they are necessary to comply with a legal obligation.

5. CONSEQUENCES OF FAILING TO PROVIDE DATA

1. If Candidates fail to provide or only partially provide the necessary personal data, CornerJob may be unable to deal with Candidates' requests for information or registration and, consequently, they shall not be able to make use of the services and activities that are available at any time on the Website and in the Applications. Moreover, Candidates are required to inform us of any changes in their personal data, so that the information in our files is up to date and error free at all times.

6. SECURITY MEASURES AND STORAGE PERIOD

1. CornerJob undertakes to handle Candidates' personal data in strictest confidence and to use them exclusively for the aforementioned purposes. It declares that it has implemented the necessary technical and organizational security measures, in accordance with current legislation, to guarantee the security of the files in which their personal data are stored in order to avoid their alteration, loss and unauthorized treatment or access, with due regard for the state of the art, the nature of the stored data and the risks to which they are exposed, whether caused by human action or physical or natural phenomena.
2. Candidates' data shall be kept for as long as they continue to be registered on the CornerJob platform or for as long as it is necessary to comply with the legal obligations.

7. COMMERCIAL ELECTRONIC COMMUNICATIONS

1. By accepting this Privacy and Commercial Communications Policy, Candidates expressly authorize CornerJob and the CornerJob Group Entities to send them the communications indicated herein by email or any other equivalent electronic communication.
2. In the event that Candidates provide such authorization, it shall cover the sending of commercial and marketing communications related to the activities, products and services of CornerJob and other CornerJob Group Entities and websites related to this platform, as well as of third parties and their websites related to job searches and the labour market.
3. CornerJob has established mechanisms by which Candidates can enable or disable electronic communications services simply and free of charge in both the registration



process and the "Profile" section. To do so, Candidates must enter their "Profile" and enable or disable the "receive activity notifications" options. They may also opt out of this service by following the instructions at the bottom of emails.

* * *



PRIVACY AND SALES COMMUNICATIONS POLICY FOR COMPANIES

Effective date: May 22nd, 2018

1. PERSONAL DATA

1. In compliance with the provisions of the applicable data protection legislation, JOB DIGITAL NETWORKS, S.L. (hereinafter, "**CornerJob**") informs representatives (hereinafter, "**Representatives**") of a company user (hereinafter, "**Company**") that the personal data they provide us with when they register at CornerJob, as well as the data that CornerJob accesses as a result of their browsing, enquiries or requests, all this through the website <http://www.cornerjob.com> (hereinafter the "**Website**") and in **CornerJob** mobile applications (hereinafter, the "**Applications**"), shall be included in a file for which CornerJob is the data controller.
2. By registering on the Website and/or the Application on behalf of the Company, Representatives declare that they have read and expressly accepted this Privacy Policy, and give their unequivocal and express consent to the processing of their personal data in accordance with the informed purposes and services provided by CornerJob, as well as the provision of their personal data to candidates who use CornerJob's services to search for and select personnel (hereinafter, "**Candidates**"), as well as to CornerJob Group Entities

2. EXERCISING RIGHTS

1. Representatives may exercise their rights to access, rectify, delete and port such data, and to restrict or oppose the processing thereof, by contacting JOB DIGITAL NETWORKS, S.L., CIF (Company Tax Code) No. B-66583907, at Edifici Palau de Mar, Plaça Pau Vila nº 1, Planta primera Sector AD, 08039 Barcelona, under the terms established in the regulations on personal data protection and other applicable implementing regulations. For more information on the content of these rights, please refer to Annex 1 to this Privacy and Commercial Communications Policy.
2. For convenience, and without prejudice to the need to comply with certain formal requirements established in the aforementioned regulations, CornerJob offers Candidates the possibility of exercising the aforementioned rights by email: gdpr@cornerjob.com.
3. If Candidates believe that their rights have not been duly respected, they have the right to file a complaint with the Spanish Data Protection Agency.

3. PURPOSES OF DATA COLLECTION

1. The purposes for which CornerJob collects the data of Representatives are as follows:
 - (viii) To manage and monitor the Company's account at CornerJob.



- (ix) To manage the selection processes that the Company accesses, by means of Representatives, through CornerJob.
- (x) To receive and send CVs or candidate user profile data to companies.
- (xi) To manage and monitor Representatives' compliance with the terms and conditions of our application and their account.
- (xii) To keep the Company informed by sending push notifications (whose contents shall relate mainly to recommended candidates, updates, new features, troubleshooting, downtime or low use, detection and prevention of errors and general compliance with the terms and conditions).
- (xiii) To regularly send, by any means, including email or equivalent means of electronic communication (including commercial communications), information relating to CornerJob's services, including suggestions and candidate profiles, CornerJob newsletters, studies and reports on the sector and, in general, any information relating to employment.

In order to ensure that this information and commercial communications match their interests as closely as possible, CornerJob may use statistical techniques to create profiles and segment their data.

In any case, Representatives may modify their preferences regarding the sending of push notifications or commercial communications, or disable them completely, in the user area. Please note that even if Representatives choose not to subscribe to or to unsubscribe from promotional emails or newsletters, we may still need to contact them regarding important non-commercial information.

- (xiv) In the event that Representatives participate in the chat forum with Candidates, the information, data and documents that Representatives share and their profile data shall be available to these Candidates.
2. CornerJob shall request the data strictly necessary to comply with the purpose of the service, such as name, address, photograph, telephone number, email, profession, languages and other necessary data. The obligation or otherwise to provide data shall be expressly stated. CornerJob offers Representatives the opportunity to find out, quickly, personally and free of charge, about job offers and/or professionals best suited to the Company, through its Applications. To do this, Representatives must select geographical areas to find jobs closest to their location.
 3. We also use Representatives' information, including information shared in the chat forum with Candidates searching for jobs at CornerJob, to complete the Company profile and to review, research and analyse ways to improve our services. We may also collect and analyse their data to monitor, maintain and improve our services and activities.



4. We perform in-house analysis (statistical and otherwise) of the information we collect about Representatives (including usage data, device data, submission data, question and answer data, and information about HTML tags) to analyse and measure the behaviour and trends of Companies and their Representatives, and to monitor and improve our Services, including to help us evaluate or design new features for them. In order to personalize information about the Company and commercial communications as much as possible, CornerJob may use statistical techniques to create user profiles and segment data.
5. We may also use Candidates' information for internal purposes in order to keep our services operational and secure, such as tests, troubleshooting, prevention of abusive activities (such as fraud, spam and phishing activities) and to improve the service and for research and development purposes.
6. As detailed in our General Conditions of Use, if Representatives connect their CornerJob account to another account they have on a social media or third party platform, we may use the information that Representatives provide us with through such social media or third party platforms and that these have made available to CornerJob, all in accordance with the privacy policy and other aspects that apply to these social media accounts or third party platforms.
7. If Representatives do not wish to receive this information and marketing communications, whatever the channel used for this purpose, they may communicate their decision free of charge through the means indicated above to exercise their rights, or by sending an email to the following address: gdpr@cornerjob.com. Your consent to receive information is always revocable, without retroactive effect.

4. DATA RECIPIENTS

1. Use of the Website and/or Applications provides the Company, through their Representatives, with access to job offers in other countries where any of the CornerJob Group entities (hereinafter, "CornerJob Group Entities") operate and allows it to search for Candidates available at any time in any of the countries where any of the CornerJob Group Entities operate, including those that do not offer a degree of protection on a similar level to that of European data protection regulations.
2. For this purpose, CornerJob must be able to communicate Representatives' personal data to the CornerJob Group Entities, whose identifying data are included in Annex 2 to this Privacy and Commercial Communications Policy, which may display Candidate profiles in the searches carried out by the Companies in each of the markets in which these entities operate.
3. Consent for the communication of personal data may be revoked at any time, although it shall not have a retroactive effect and shall mean that Representatives



may not continue to make use of the services and activities that are available at any time on the Website and in the Applications.

4. In addition, Representatives' personal data shall be made available to the service providers that manage our platform, including the cloud computing system and any possible outsourcing to third party providers. Outsourced providers shall comply at all times with the conditions laid down in the applicable data protection legislation, including those relating to international data transfers outside the EU.

No further data communications are envisaged, unless they are necessary to comply with a legal obligation.

5. CONSEQUENCES OF FAILING TO PROVIDE DATA

1. If Representatives fail to provide or only partially provide the necessary personal data, CornerJob may be unable to deal with their requests for information or registration and, consequently, they shall not be able to make use of the services and activities that are available at any time on the Website and in the Applications. Moreover, Candidates are required to inform us of any changes in their personal data, so that the information in our files is up to date and error free at all times.

6. SECURITY MEASURES AND STORAGE PERIOD

1. CornerJob undertakes to handle Representatives' personal data in strictest confidence and to use them exclusively for the aforementioned purposes. It declares that it has implemented the necessary technical and organizational security measures, in accordance with current legislation, to guarantee the security of the files in which their personal data are stored in order to avoid their alteration, loss and unauthorized treatment or access, with due regard for the state of the art, the nature of the stored data and the risks to which they are exposed, whether caused by action or physical or natural phenomena.
2. Candidates' data shall be kept for as long as they continue to be registered on the CornerJob platform or for as long as it is necessary to comply with the legal obligations.

7. COMMERCIAL ELECTRONIC COMMUNICATIONS

1. By accepting this Privacy and Commercial Communications Policy, Representatives expressly authorize CornerJob and CornerJob Group Entities to send them the communications indicated herein by email or any other equivalent electronic communication
2. In the event that Representatives provide such authorization, it shall cover the sending of commercial and marketing communications related to the activities, products and services of CornerJob and other CornerJob Group Entities and websites related to this platform, as well as of third parties and their websites related to job searches and the labour market.



3. CornerJob has established mechanisms by which Representatives can enable or disable the electronic communications services simply and free of charge in both the registration process and the "Profile" section. To do so, Representatives must enter their "Profile" and enable or disable the "receive activity notifications" options. They may also opt out of this service by following the instructions at the bottom of emails.

* * *



ANNEX 1

GENERAL DATA PROTECTION REGULATION RIGHTS WITH REGARD TO THE PROCESSING OF PERSONAL DATA

Effective date: May 22nd, 2018

1. DATA SUBJECT RIGHTS

This guideline provides you with an overview of the relevant elements of rights under the General Data Protection Regulation (“GDPR”) regarding the personal data that CORNERJOB, as the Data Controller, processes about you.

1.1. What are the data subject’s rights?

In particular, except in certain determined cases, data subjects can obtain from the controller free of charge:

- (i) **Access** to their own data: the data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data.
- (ii) **The rectification** without undue delay of inaccurate or incomplete data related to them.
- (iii) **The erasure** (“right to be forgotten”) of their data for instance if their use is unlawful (e.g. processing of sensitive data).
- (iv) **The restriction of processing** in certain circumstances.
- (v) On compelling legitimate grounds, data subjects can **object** at any time to the processing of data relating to them.
- (vi) Special right to object to automated individual decisions.
- (vii) **The data portability** to another controller, where technically feasible and in certain circumstances.

1.2. Which exceptions apply?

Data subjects' rights can be restricted, but they cannot be denied. This limitation can take place in specific cases (Article 23 GDPR), for a determined period of time and only if necessary, to safeguard, among others:



- (i) The prevention, investigation, detection and prosecution of criminal offences (as well as of disciplinary proceedings and administrative enquiries).
- (ii) An important economic or financial interest of a Member State or of the European Union.
- (iii) The protection of the data subject or of the rights and freedoms of others.
- (iv) The national security, public security or defense of the Member States.

2. RIGHT OF ACCESS

As data subject you have the right to access your personal data, so you can ask for a copy of the data we hold on you. This applies to any personal data that we hold, so we will tell you what data and what categories of data we have and, in particular:

- (i) The **purposes** of the processing.
- (ii) The **categories of personal data** concerned.
- (iii) The **recipients** or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries.
- (iv) Where possible, the period for which the personal data will be **stored** or, if this information is not known, the criteria used to determine this period.
- (v) The data subject's **right to request from the controller the rectification or deletion of personal data or a restriction on the processing of his or her personal data and to object to such processing.**
- (vi) The **right to lodge a complaint** with a supervisory authority.
- (vii) Where the personal data are not collected from the data subject, any available information as to their **source**.
- (viii) The **existence of automated decision-making**, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
- (ix) The **appropriate safeguards** taken by CORNERJOB with regard to transfers of personal data to third countries.

Data will be sent to you electronically, and there will be no charge.

We will let you know the purpose(s) the data is processed for, and any other organizations we share the data with, also if any data we hold is collected from other sources.



3. RIGHT TO REQUEST RECTIFICATION

This concerns correcting your personal data that we held. In particular, if you believe the data held is not accurate, you can request that it is corrected without undue delay. Similarly, if data is incomplete you can ask that it is completed.

We are obliged to rectify incorrect data and incomplete data without undue delay. However, please note that the right of rectification only applies to objective and factual data, not to subjective statements (which, by definition, cannot be factually wrong).

4. RIGHT TO ERASURE (“RIGHT TO BE FORGOTTEN”)

This allows you to request that we delete our records or some of our records in so far as they identify you if any of the following grounds applies:

- (i) The personal data are no longer necessary for the purpose(s) for which they were collected or otherwise processed.
- (ii) The data subject withdraws the consent on which the processing is based, and there is no other legal ground for the processing.
- (iii) The data subject objects to the processing and there are no overriding legitimate grounds for the processing or the data subject objects to the processing for direct marketing purposes.
- (iv) The personal data have been unlawfully processed.
- (v) The personal data must be deleted in order to comply with a legal obligation under European Union or Member State law to which the controller is subject;
- (vi) The personal data were collected in order to offer information society services to children

The right to erasure shall not apply to the extent that processing is necessary:

- (a) To exercise the right of freedom of expression and information.
- (b) To comply with a legal obligation under EU or Member State law to which we are subject or to perform a task carried out in the public interest or in the exercise of official authority vested in us.
- (c) If records are required to protect public health.
- (d) For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with the provisions of the GDPR insofar as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of the processing.



- (e) To establish, assert or defend legal claims.

5. RIGHT TO IMPOSE A RESTRICTION ON PROCESSING

You can ask that access to your records is limited where any of the following grounds applies:

- (i) If you are contesting the accuracy of the data on record and we are seeking to verify it.
- (ii) If the processing of your data is unlawful, but you want the record preserved.
- (iii) If we no longer need the personal data for the purposes of the processing, but they are still required by you to establish, exercise or defend a legal claim.
- (iv) If you have objected to the processing based on a legitimate interest pending verification whether the legitimate grounds of CORNERJOB override your rights as data subject.

In these circumstances CORNERJOB may only process the data with your consent or to establish exercise or defend a legal claim or to protect the rights of another person or important public interest.

6. RIGHT TO OBJECT

You have the right to object to CORNERJOB processing your data if you dispute the authority to processed data.

- (i) On grounds relating to your particular situation, grounds of public interest, and the legitimate interest ground, including profiling based on these grounds.
- (ii) For direct marketing and research purposes, including profiling.

If you make an objection, you can ask that we restrict processing while you objection is being considered.

7. RIGHT TO OBJECT TO AUTOMATED DECISION MAKING

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. This right does not apply if the decision:

- (i) Is necessary to enter into or perform a contract between you and us.
- (ii) Is authorized by EU or Member State law to which we are subject and which lays down suitable measures to safeguard the data subject's rights, freedoms and legitimate interests.



- (iii) Is based on your express consent.

8. RIGHT TO PORTABILITY

This allows you to be provided with a copy of your personal data, which you have provided to us, in a structured, commonly used and machine-readable format. The purpose of this right is to empower you as data subject and give you more control over your personal data.

This right will apply under 3 cumulative conditions:

- (i) First, the personal data requested should be processed, by automatic means (i.e. excluding paper files) on the basis of your prior consent or on the performance of the CORNERJOB service to which you are a party
- (ii) Second, the personal data requested should concern your data and be provided by you.
- (iii) The exercise of this right should not affect adversely the rights and freedoms of third parties.

9. HOW TO EXERCISE YOUR RIGHTS

You can exercise your General Data Protection Regulation rights directly by contacting us at gdpr@cornerjob.com.

We will respond to your request to exercise any of the above rights as soon as we can and within one month (30 days) of your request. If this is not possible due to the complexity or size of the request, we will let you know. In exceptional circumstances we can extend the timescale to 3 months or 90 days. We will let you know why if this is the case.

If you consider that any use of your data might breach any of your rights, you can lodge a complaint at any time by opening a support ticket from our Help centre or, alternatively, by filing a complaint before the Spanish Authority on Data Protection (Agencia Española de Protección de Datos) at www.agpd.es

* * *



ANNEX 2 CORNERJOB GROUP ENTITIES

Effective date: May 22nd, 2018

Job Digital Networks, S.L.

Edifici Palau de Mar, Plaça Pau Vila 1, 1, sector AD
08039 Barcelona
Spain

CornerJob S.r.l.

Via Domodossola 17
20145 Milano
Italy

CornerJob France S.A.S.

24 Rue de Clichy
75009 Paris
France

CornerJob Spain, S.L.U.

Edifici Palau de Mar, Plaça Pau Vila 1, 1, sector AD
08039 Barcelona
Spain

CornerJob Mexico, S.A.P.I. de CV

Bahía de Santa Bárbara #145
Col. Verónica Anzures
C.P. 11300 Ciudad de México
Mexico