

Joom Group Website Privacy Policy

This Privacy Policy, also referred to as "Policy" describes how SIA Joom uses and protects the information we process about our users. Any use (including visit) of the Joom Group Website (the **Website**) is subject to this Policy and updates thereof.

The controller of your data is SIA Joom, registered at Gustava Zemgala st. 78-1, LV-1039, Riga, Latvia (email for personal data management and data subject rights requests: privacy@joom.com).

1. Data that we collect and process

In course of your use of our Website, we collect and process certain data relating to you. To use our Website, you are not required to provide any personal data such as your contact details to us, but we some technical data relating to your visit will be collected automatically as described below.

You can also provide us with certain information about you if you decide to apply for a job posted on our Website. In such case we will process your personal data provided to us as further also described below.

Technical data relating to your visit

We aim to better understand how our Site is used. To this end, we collect certain technical data when you visit the Website, such as your device details and details regarding your connection (such as IP address).

This data may include, inter alia, UTM labels. We receive the relevant information about your visits and interaction with third-party services provided by others, the country where you are currently located, cookies, device information and internet protocol ("IP") address (if applicable). If you use our Website from a mobile device, that device will send us data about your chosen language interface based on your phone settings, your advertising ID. We may also obtain additional available information regarding your device in order to tailor the Website to you.

Job application data

On our Website we post vacancies opened by companies of Joom Group. In order to apply for a job, you will be asked to provide certain information such as your CV, cover letter, and contact details, to us by sending an email.

We respect your privacy and are committed to protecting your personal data. When you apply, we process your personal data only for recruitment purposes and in accordance with Joom Recruitment Privacy Policy providing high standards of ensuring confidentiality and security of your personal data. If you have any further questions about processing, please contact us: privacy@joom.com.

2. Duration of processing

We process your data no longer that it is necessary for the purposes identified in this Policy. Unless we are obligated by law to retain such data, we safely delete or anonymize the data so it may no longer be attributable to you in accordance with our retention policies.

Below you may find the factors we take into consideration when determining specific retention periods:

- For processing based on your consent we store your data as long as necessary to achieve the purpose indicated in your consent or until you withdraw it, whichever earlier;
- For processing based on performance of a contract with you (including to take steps prior to enter into a contract with you) the retention period is generally the duration of the contract or negotiating of the contract if such negotiation does not result in conclusion of the contract;
- For processing based on our legal obligation, the terms are provided under the relevant law;
- For processing based on legitimate interests, the specific retention term is determined based on the balance between risks for your rights and freedoms against our legitimate interests.

3. Purposes of processing and legal basis for data processing

In order to process your personal data, we need to establish and secure a lawful basis in accordance with the requirements of the applicable law. You may be acquainted with consent as one of the lawful bases that you come across while using this or other services. Apart from consent, there are, however, other grounds for processing your data. For example, we will need to process your data in order to take steps prior to enter into and perform our contract with you. In other cases, we may be obliged by the law to process certain data, for example, under applicable accounting law. Furthermore, in certain cases we may have legitimate interest to process your data.

Please note that each legal basis comes with its own set of rights granted to you attached to it. Please read the below section carefully, since, for example, we will not be able to stop processing data in connection with our performance of the contract without terminating our contract with you.

Processing is necessary for the performance of a contract with you or in order to take steps to enter into a contract with you, such as processing of your job application

- Receiving and reviewing your CV and other information provided by you when you apply for a job to taking steps to enter into an employment agreement with you.

Processing is necessary to comply with our legal obligations

- Retention of data in order to comply with specific applicable retention requirements, including those under applicable accounting law.

Processing is based on our legitimate interest

- Participation in judicial, enforcement and other similar proceedings by state courts, supranational bodies, enforcement agencies, arbitral tribunal etc. with respect to protection of our interests and/or interests of third parties as well as prosecution of illegal activities where it is proportional, taking into account all relevant factors, to disclose the information to third parties;

- Maintenance of information security of our Website;
- Development of information security of our Website;
- Prevention, detection and investigation of security breaches, fraudulent and other prohibited or unlawful activities;
- Performance of analysis allowing us to tailor and improve our Website to provide the best experience to you;
- Development and improvement of our Website, including provision of site features as remembering your interface language chosen.

4. Recipients of your data

Where necessary, we transmit personal data pertaining to you to the following recipients:

- Members of our group of companies and affiliated entities;
- Law enforcement agencies, courts, government agencies or public authorities;
- Third party service providers;
- Third parties involved in judicial and/or administrative proceedings.

5. Technical and organizational security measures followed by the controller

In accordance with the applicable requirements, we have determined and implemented appropriate technical and organizational measures to safeguard your data against accidental loss and unauthorized disclosure.

We require our processors acting under our instructions to protect any data they may receive in a manner consistent with this Policy. We do not allow them to use such information for any other purpose.

6. International data transfers

In order to operate our Website, we process, incl. transmit your data within the EU as well as outside of it. In the latter case we undertake all the necessary safeguards provided under the applicable legislation.

Where data is transferred outside of the EU to a territory that has not been deemed adequate by the European Commission, we rely on appropriate safeguards under Article 46 of the GDPR. As a rule, the safeguard applied is that the transfer is subject to standard contractual clauses (SCC) adopted by the European Commission binding upon recipients of your data. You may learn more about the standard contractual clauses [here](#).

7. Your Rights

You are entitled to contact us with requests for exercising of rights granted under the applicable data protection law.

We will process your request and provide you the relevant option without undue delay within 30 days after such request has been submitted. When you make such requests, we may need time to investigate and facilitate your request. After we process your request, we will send you a confirmation at the email address that you provide us for this purpose.

When you submit such request, you warrant and represent that you are the natural person in relation to which the contemplated data have been provided, shared and/or processed and you have full capacity and authority to submit such request. We reserve right to check this based on the data, that was shared with us, in case we have doubts and also to provide this information to the third parties, including the authorities, should they lawfully request such information.

Pursuant to the GDPR, you have the following rights with respect to your data:

- **Request access** your data as well as receive personal data relating to you in a structured, commonly used, and machine-readable format (**right to data portability**).
- **Request rectification** of your data where the data is inaccurate. You may edit your data through your account settings.
- **Withdraw your consent**, which will result in the termination of processing based on your consent as the lawful basis for personal data processing.
- **Object to processing** of your personal data where the data processing is based on our legitimate interest. In order to process your request, we kindly ask you to provide the ground for your particular situation why you object.
- **To have your data erased**, unless the processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation which requires processing by Union or Member State or for the performance of a task carried out in the public interest; for the establishment, exercise or defence of legal claims.
- **To restrict processing** where the accuracy of the personal data is contested by you; the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead; we no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims; you have objected to our use of your data pending the verification whether such processing should be carried on.
- **To lodge a complaint** with the supervisory authority in accordance with their competence. Typically, you may address the supervisory authority of your place of residency, as well as the supervisory authority as the registered address of the controller.

You may manage your data by sending an email at privacy@joom.com in case you have any other request not listed above or you have any question in connection therewith.

You may also have the right to contact our Data Protection Officer via privacy@joom.com.

Should you wish to communicate with us via mail:

SIA "Joom"

Address:

Gustava Zemgala st. 78-1, LV-1039, Riga, Latvia

Country Annex

Russia

For purposes of compliance with Russian law and to the extent the processing under this Policy relates to processing of personal data subjects in Russia, this country annex for Russia applies.

- Any reference to GDPR and applicable legislation is deemed to include the Russian Federal Law 152-FZ "On personal data" (as amended from time to time).
- The terms "controller" and "processor" used in this Policy shall be deemed to be equivalent to the definition of "operator" and "person processing data under assignment", respectively, as provided by the Russian Federal Law 152-FZ "On personal data" (as amended from time to time).
- Section 5. Technical and organizational security measures followed by the controller shall be amended as follows:
 - The heading shall read "Legal, organizational and technical security measures followed by controller";
 - The first paragraph of section 5 shall read "In accordance with the applicable requirements, including Article 19 of the Russian Federal Law 152-FZ "On personal data", we have determined and implemented appropriate legal, organizational and technical measures to safeguard your data against accidental loss and unauthorized disclosure.";
- To the extent allowed by applicable law and solely for purposes of compliance with Russian law, the use of the Website and applying for job by sending an email / filling the webform, constitutes acknowledgement to the Policy's contents and consent to the processing of your personal data in accordance with this Policy as an alternative to the legal bases provided herein, should they be deemed invalid by the Russian data protection authority or applicable judicial authority.
- The rights provided under Articles 14-17 of the Russian Federal Law 152-FZ "On personal data" are incorporated herein by reference to the extent they are not already covered by Section 7. Your Rights and are not in conflict with other provisions of this Policy.