

# Privacy Policy

This privacy policy explains how Tellent collects, uses, shares and protects personal data in the course of operating its business.

Unless otherwise indicated, the data controller for the processing of personal data as described in this privacy policy is Recrutee B.V.

## 1. Personal data of website visitors

This paragraph describes the processing of personal data by Tellent when you visit the Tellent Websites. The personal data of Visitors is collected and used for the following purposes:

Purpose	Categories of personal data
The functioning of the Tellent Websites	<ul style="list-style-type: none"><li>● Browser and Internet Metadata</li></ul>
Monitoring the performance of the Tellent Websites	<ul style="list-style-type: none"><li>● Browser and Internet Metadata</li><li>● Usage Patterns of the Tellent Websites</li></ul>
Supporting the business operations of Tellent, including sales and marketing	<ul style="list-style-type: none"><li>● Browser and Internet Metadata</li><li>● Usage Patterns of the Tellent Websites</li></ul>
Improving and optimizing the Tellent Websites and Tellent Services	<ul style="list-style-type: none"><li>● Browser and Internet Metadata</li><li>● Usage Patterns of the Tellent Websites</li></ul>

Tellent and its partners place cookies for all the purposes listed in this paragraph, additional information about Tellent’s cookies may be available in the cookie consent banners of the Tellent Websites.

Tellent relies on legitimate interests as its legal basis for processing personal data for purposes listed in this paragraph. Such legitimate interests are the same as the purposes that Tellent processes personal data for. For example, the legitimate interest for processing personal data for the purpose of “*the functioning of the Tellent Websites*” is also “*the functioning of the Tellent Websites*”. The personal data listed in this paragraph will be deleted when it is no longer necessary for the purposes it was collected for. More information about retention periods is available on request.

## 2. Use of personal data of Users for Tellent’s business operations

Tellent processes the personal data of Users for the following business operations purposes:

Purpose	Categories of personal data
Tellent's billing and administration	<ul style="list-style-type: none"> <li>● Name and contact details such as address, e-mail and phone number</li> <li>● Job title and organization</li> <li>● Billing details</li> </ul>
Tellent's strategic decision making (such as decisions about which services to focus company resources on)	<ul style="list-style-type: none"> <li>● Feedback on Tellent Services</li> <li>● Usage Patterns of the SaaS Products</li> <li>● Contents of communications with Tellent's sales and marketing teams</li> </ul>
Sales and marketing of Tellent Services	<ul style="list-style-type: none"> <li>● Name and contact details such as address, e-mail and phone number</li> <li>● Job title and organization</li> <li>● Contents of communications with Tellent's sales and marketing teams</li> <li>● Browser and Internet Metadata</li> <li>● Usage Patterns of the SaaS Products</li> </ul>
Improving the Tellent Services	<ul style="list-style-type: none"> <li>● Name and contact details such as address, e-mail and phone number</li> <li>● Job title and organization</li> <li>● Browser and Internet Metadata</li> <li>● Usage Patterns of the SaaS Products</li> <li>● Feedback on Tellent Services</li> </ul>
Monitoring the health and performance of the Tellent Services	<ul style="list-style-type: none"> <li>● Username, name and email</li> <li>● Organization</li> <li>● Browser and Internet Metadata</li> <li>● Usage Patterns of the SaaS Products</li> </ul>
Customer support and customer success for the KiwiHR Application, Javelo Application and Recruitee Application	<ul style="list-style-type: none"> <li>● Name and contact details such as address, e-mail and phone number</li> <li>● Job title and organization</li> <li>● Browser and Internet Metadata</li> <li>● Usage Patterns of the SaaS</li> <li>● Customer support and customer success communications in relation to the SaaS Products</li> </ul>
Allowing Users to login to all SaaS Products with one set of login credentials	<ul style="list-style-type: none"> <li>● Username and email address</li> <li>● Password</li> <li>● Authentication tokens and keys</li> </ul>

Tellent relies on legitimate interests as its legal basis for processing personal data for purposes listed in this paragraph. Such legitimate interests are the same as the purposes that Tellent processes personal data for. Tellent will delete personal data relating to Users after the services associated with the personal data are cancelled and the personal data is no longer

necessary for any of the purposes listed in this paragraph. More information about retention periods is available on request.

Entities that are part of Tellent and Affiliates may receive personal data that is processed for Tellent’s billing and administration insofar as necessary for their own billing and administration purposes.

### **3. The provisioning of the Recruitee Application by Tellent to Users**

This paragraph only applies to the processing of personal data of Users of the Recruitee Application for which Tellent is the controller. Our Customers carry the responsibility for some of the other processing activities that relate to the Recruitee Application such as the processing of personal data of Candidates and Referrers. Please refer to paragraph 12 for more information about that separation of responsibility.

Tellent processes the personal data of Users for the following purposes:

<b>Purpose</b>	<b>Categories of personal data</b>
Providing the Recruitee Application	<ul style="list-style-type: none"><li>● Username and password</li><li>● Activities in the Recruitee Application</li><li>● Browser and Internet Metadata</li><li>● Other personal data entered into or synced with the Recruitee Application</li></ul>

Tellent relies on legitimate interests as its legal basis for processing personal data for purposes listed in this paragraph. Such legitimate interests are the same as the purposes that Tellent processes personal data for. The Customer and/or User primarily decides the retention period for all personal data that he can control the retention of through the Recruitee Application or that he can provide instructions for under the agreements between Customer and Tellent. Tellent will delete personal data that is listed in this paragraph after the services associated with the personal data are cancelled and the personal data is no longer necessary for any of the purposes listed in this paragraph. More information about retention periods is available on request.

Tellent’s use and transfer to any other app of information received from Google APIs will adhere to the [Google API Services User Data Policy](#), including the Limited Use requirements. Information from Google APIs includes information from any Gmail account or Google Calendar account that a User connects to the Recruitee Application. Tellent will not use information from a User’s Gmail account or Google Calendar account for any other purpose than providing the Recruitee Application.

### **4. Newsletters, webinars/events and demos**

Tellent may also process the personal data of anyone that registers/requests for a newsletter of Tellent, a product demo by Tellent, a webinar/event of Tellent or to be contacted by a business partner of Tellent to learn more about products and services of that business partner. In such cases Tellent may process personal data for the following purposes:

<b>Purpose</b>	<b>Categories of personal data</b>
The registrant's attendance of and/or participation with the product demo and/or webinar/event that the registrant has signed up for	<ul style="list-style-type: none"> <li>● Name</li> <li>● Contact details such as email and phone number</li> <li>● Job title and organization</li> </ul>
Sending a newsletter that the registrant has signed up for	<ul style="list-style-type: none"> <li>● Name</li> <li>● Job title and organization</li> <li>● Email address</li> </ul>
Sales and marketing of Tellent Services	<ul style="list-style-type: none"> <li>● Name</li> <li>● Job title and organization</li> <li>● Contact details such as email and phone number</li> <li>● The contents of communications with Tellent's sales and marketing teams</li> </ul>
Improving the services and operations provided by Tellent based on your feedback	<ul style="list-style-type: none"> <li>● Name</li> <li>● Job title and organization</li> <li>● Contact details such as email and phone number</li> <li>● The contents of communications with Tellent's sales and marketing teams</li> </ul>
Tellent's strategic decision making (such as decisions about which services and business partners to focus company resources on)	<ul style="list-style-type: none"> <li>● Name</li> <li>● Job title and organization</li> <li>● The products and services that you have showed interest in</li> </ul>
On your request, putting you in contact with a business partner of Tellent to help you learn more about the business partner's products and services	<ul style="list-style-type: none"> <li>● Name</li> <li>● Contact details such as email and phone number</li> <li>● Job title and organization</li> <li>● The products and services that you have showed interest in</li> </ul>

Where appropriate, Tellent will ask your consent for the processing. In other cases Tellent relies on legitimate interests for the processing of the personal data for the purposes described above. Such legitimate interests are the same as the purposes that Tellent processes personal data for. The personal data that is stored for the processing described in this paragraph will be

deleted when it is no longer needed for the purposes listed in this paragraph. More information about retention periods is available on request.

## 5. Other

Tellent may also process personal data to investigate or address claims or disputes relating to use of its services, to satisfy requirements under applicable laws, regulations, or agreements, or pursuant to legal process or governmental request, including from law enforcement. Tellent relies on compliance with a legal obligations as a legal basis where the processing is necessary for compliance with applicable legal requirements. Otherwise, Tellent relies on its legitimate interests as a legal basis to perform the above activities on the grounds that they are necessary for purposes of Tellent’s legitimate interests in investigating and responding to claims and disputes relating to use of Tellent’s services.

Further, Tellent may obtain your personal data in ways that are not described in this privacy policy. In those cases you will be informed about the details of such processing through other means than this privacy policy. Please note that if Tellent is processing your personal data then you may always reach out to Tellent to request to exercise your rights, such as asking how we process your personal data. Your rights under data protection law are described hereafter in paragraph 14.

## 6. Social media and distributed content

Tellent may use the services of its partners to stay in touch with you or to provide you with content. For example, we may provide you with articles through our Facebook page. Services of Tellent’s partners may also be used for Tellent and its partners to process personal data or place cookies on your device for the following purposes:

Purpose	Categories of personal data
Sales and marketing of Tellent Services	<ul style="list-style-type: none"><li>● Social media profile</li><li>● Unique identifiers for social media</li><li>● Contact details (such as email)</li></ul>
Improving our product and user experience	
Communicating with customers and potential customers on social media	

Tellent may also process public social media posts to stay up-to-date on and respond to social media activity in relation to its business.

Where appropriate, Tellent will ask your consent for the processing. In other cases Tellent relies on legitimate interests for the processing of the personal data for the purposes described above. Such legitimate interests are the same as the purposes that Tellent processes personal data for. The personal data that is stored for the processing described in this paragraph 6 will be deleted when it is no longer needed for the purposes listed in this paragraph 6. More information about retention periods is available on request.

## 7. Advertising

The following companies process your personal data that was collected for the purposes of marketing and sales to help Tellent serve you Tellent's advertisements on third party websites and applications: Facebook, G2, Google, LinkedIn, Microsoft (Bing), Twitter, Quora, Oath (Yahoo), Reddit and Outbrain. Unique identifiers (with the help of cookies), contact information and browsing history are processed for those purposes. Opt-outs for processing of your personal data for this purpose are available on the following pages:

<http://optout.aboutads.info/> (Facebook, Google, LinkedIn, Microsoft, Twitter, Oath and Outbrain)

[https://www.g2.com/static/cookie\\_policy](https://www.g2.com/static/cookie_policy) (G2)

<https://www.quora.com/optout> (Quora)

<https://www.reddit.com/personalization/> (Reddit)

## 8. E-mails & other communications

Tellent may send you e-mails with information about Tellent Services, or other information that may interest you. E-mails will only be sent based on your prior consent, unless you register for Tellent Services. If you are registered for a Tellent Service you may receive e-mails about similar services or to help you become a successful user of our services. You can contact us by e-mail to opt-out of our e-mails or use the unsubscribe links provided in the e-mail communications that we send you.

Communications between you and Tellent such as chats, e-mails, phone conversations and private messages may be stored to improve our communications and for future reference. More information about retention periods is available on request.

## 9. Applicants to Tellent jobs (careers.tellent.com)

*This section applies to applicants of jobs at Tellent as shown on our Careers Site (careers.tellent.com) and any other candidates or potential candidates for any jobs with Tellent. Our customers have separate privacy policies for their recruitment activities and such recruitment activities are not covered by this privacy policy.*

Tellent may collect your personal data for recruitment purposes in one of the following three ways:

1. **You apply for a job at Tellent:** If you apply for a job at Tellent then we process your personal data to facilitate the entire job application procedure on the grounds of our legitimate interests for recruitment. Your data will be kept by Tellent for up to 37 days. That period may be extended by 37 days after we have last corresponded with you over email to make sure that your personal data is not deleted while you are in an application procedure. If you provide your consent for it, Tellent may keep your profile in its talent pool for Tellent to reach out to you about future job opportunities

and to otherwise process your personal data in relation to recruitment for job openings at Tellent.

2. **We source you through publicly available resources:** Tellent may, based on its legitimate interests for recruitment, search through publicly available resources such as LinkedIn to find candidates that have skills, experience and interests that match with Tellent's staffing needs. If Tellent believes that you may be a match with Tellent's staffing needs, then Tellent will, based on its legitimate interests for recruitment, process your personal data for the purpose of reaching out to you and asking for your consent to match you with job opportunities at Tellent and to otherwise process your personal data in relation to recruitment for job openings at Tellent. If the consent is not provided then your personal data will be automatically deleted within 37 days after it has first been collected. If consent is required under applicable law to contact you, we will only contact you if you have consented.
3. **You are referred by someone:** Someone who knows you might refer you to us because that person believes you have skills, experience and interests that match with Tellent's staffing needs. Upon receiving your contact details and determining that you are a good match we will, based on our legitimate interests for recruitment, reach out to you to ask for your consent to match you with job opportunities at Tellent and to otherwise process your personal data in relation to recruitment for job openings at Tellent. If the consent is not provided then your personal data will be automatically deleted within 37 days after it has first been collected. If consent is required under applicable law to contact you, we will only contact you if you have consented.

The following personal data can be processed for a job application procedure or other recruitment activities:

- Any personal data that you provide through our job application form or that we collect during the recruitment process including, but not limited to:
  - Contact details such as full name, email address, phone number
  - Picture, cover letter, résumé and LinkedIn profile
  - Which job you are in a hiring process for
  - Statuses, notes, evaluations and planning related to a hiring process that relates to you
  - Email and SMS communications

Under European data protection law we are required to inform you that withholding personal data in your job application can give you a disadvantage in comparison to other candidates who are applying for the same role. Tellent may share your personal data with individual Tellent entities once a hiring decision has been made for the purpose of making a hire through that entity.

## 10. Other recipients of personal data

We may share personal data:

1. With Sympa based on our legitimate interest; for administrative, operational, recruitment, technical reasons and/or for marketing purposes;

2. With relevant third parties as part of a corporate transaction, such as a reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with a bankruptcy or similar proceeding);
3. With one of our business partners, on your request to learn more about the products and/or services of that business partner;
4. With financial, tax, legal and strategic consultants for the purpose of receiving legal, accounting and compliance advice for Tellent and for the purpose of receiving advice on the commercial and product strategy of Tellent, and;
5. For legal reasons or in the event of a dispute with relevant third parties, e.g. financial, tax, legal and strategic consultants for the purpose of receiving advice and/or law enforcement officials and other government authorities where required.

When we are sharing your personal data with Sympa for marketing purposes, they will only send you marketing communications concerning products or services that are similar to those that we are providing to our customers or relevant to your role at your organization. For the sake of clarity, we do not share personal data that we process on behalf of our customers in our role as a processor with Sympa or other third parties, unless we are instructed to do so by our customers. The privacy policy of Sympa can be found here:

<https://www.sympa.com/privacy-policy/>

## **11. Cookie permissions**

Upon visiting our websites for the first time you are presented with our cookie consent tools. The cookie consent tools offer visitors a choice to either accept or reject cookies that require your consent under data protection law. Tellent will always respect your choices. It's also possible to either disable or delete our cookies in your internet browser.

## **12. Tellent's responsibility versus responsibility of Customers**

In many cases Tellent processes personal data as a service for Customers of the SaaS Products. In those cases the Customer carries the responsibility for the personal data that is being processed. In the words of the European Union's GDPR the Customer is the controller and one of the Tellent companies is the processor. This privacy policy (only) describes the processing of personal data insofar as Tellent is the controller. The details of the processing of personal data by our Customers can be found in the privacy policies of our Customers. We encourage you to review the privacy policies of our Customers before submitting any personal data to them.

The other paragraphs of this privacy policy provide detailed information about the processing that Tellent is responsible for, but for a more simplified overview of who the controller is please refer to the following matrix:



	Personal data of Users of the Recrutee Application	Personal data of Candidates processed by the Recrutee Application	Personal data of Referrers processed by the Recrutee Application	Personal data processed by the Javelo Application	Personal data processed by the KiwiHR Application
Providing the functionality of the application	Tellent	Customers	Customers	Customers	Customers
Billing, administration, sales, strategic decision making and marketing of Tellent Group	Tellent	Not used for this purpose	Not used for this purpose	Tellent	Tellent
Customer support and customer success for the application	Tellent	Customers	Customers	Tellent	Tellent
Monitoring the health and performance of the application	Tellent	Customers	Customers	Tellent	Tellent
Improving the application	Tellent	Customers	Customers	Tellent	Tellent

### 13. Transfers outside of the European Union

A processing of personal data under the responsibility of Tellent may involve a transfer of personal data outside of the European Union (such as to the United States of America and the United Kingdom). In such cases Tellent always remains the responsible party for the processing (controller). In the absence of adequacy decisions (such as the Data Privacy Framework and the UK adequacy decision), Tellent uses standard contractual clauses for use between controller and controller (module one) and between controller and processor (module two) as grounds for legitimizing such a transfer. Please note that Tellent will never transfer personal data that it processes on behalf of its Customers, as a processor, outside of the European Union, unless the Customer instructs Tellent to do so. Please contact us for more information about data transfers to countries outside of the European Union.

### 14. Your rights, requests or questions

Feel free to contact us if you have any questions regarding your personal data. You can also contact us with requests to exercise your rights under European data protection law. Such rights include the rights to access, rectification, erasure, restriction of processing, data portability and objection to processing.

Wherever we rely on your consent, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

There are instances where we have a legitimate interest to use your data. Our legitimate interest will vary depending on what we are using your data for, and we explain above what the interest is and how it relates to the processing operations that we are carrying out. Where we process personal data on the basis of a legitimate interest, then – as required by data protection law – we have carried out a balancing test to document our interests, to consider what the impact of the processing will be on individuals and to determine whether individuals interests outweigh our interests in the processing taking place. You can obtain more information about this balancing test by contacting [info@tellent.com](mailto:info@tellent.com).

If you would like to exercise your rights or otherwise have any requests or questions with regard to your personal data you can contact us at: [info@tellent.com](mailto:info@tellent.com).

If you have unresolved concerns, you have the right to complain to a data protection authority in the country that you reside in or, the country of your place of work or the country where the alleged infringement took place. If you are based in the EU, you can find the contact details of your local data protection authority by clicking [here](#).

## 15. Updates to this policy

From time to time, Tellent will revise this policy. Tellent recommends that you regularly check whether this policy has been revised. However, where possible, Tellent will notify Users via notifications in the in-app live chat or by e-mail about any substantive or material changes. This policy does not apply to third-party services that may be accessed through links on the Services.

## 16. Tellent's identity and address

The contact details of Tellent are as follows.

Postal mail: Tellent, Keizersgracht 313, 1016 EE Amsterdam, The Netherlands to the attention of the Data Protection Office.

E-mail: [info@tellent.com](mailto:info@tellent.com)

## 17. Definitions

The following definitions have the following meanings in this privacy policy:

**'Affiliate'**: Any entity that Tellent Controls, is Controlled by or is under common Control with Tellent (where 'Control' means the direct or indirect ownership of at least fifty percent (50%) of the ownership or voting rights);

**'Browser and Internet Metadata'**: The metadata of requests and responses sent to Tellent by your device and by Tellent to your device: time, headers, approximate location, device, browser, unique identifiers such IP-address and referrer;

**'Candidates'**: Any candidate, potential candidate, applicant or potential applicant for a job position of our Customers or visitor of a Careers Site of a Customer of Tellent;

**'Careers Site'**: A website that is used by an organization for talent acquisition purposes such as publishing vacant job positions and publishing job application forms;

**'Customers'**: Tellent's paying and non-paying customers for its SaaS Products;

**'Javelo Application'**: The SaaS for performance management marketed under the brand 'Javelo';

**'KiwiHR Application'**: The SaaS for human resources management marketed under the brand 'KiwiHR';

**'Recruitee Application'**: The SaaS for talent acquisition marketed under the brand 'Recruitee';

**'Referrers'**: Anyone who visits a referral site of a Tellent Customer or makes a referral for a Candidate through the SaaS Products;

**‘SaaS’:** Software as a Service;

**‘SaaS Products’:** The Recruitee Application, the KiwiHR Application and the Javelo Application;

**‘Tellent’:** Recruitee B.V., Recruitee GmbH, Recruitee Inc., Recruitee Sp. Z o.o., Teamrise SAS, YooniQ solutions GmbH, YooniQ solutions Sp. Z o.o. and their subsidiaries;

**‘Tellent Services’:** Any services provided by Tellent;

**‘Tellent Websites’:** <https://www.recruitee.com>, <https://recruitee.com>, <https://www.javelo.io>, <https://javelo.io>, <https://www.kiwihr.com>, <https://kiwihr.com>, <https://www.tellent.com>, <https://tellent.com>, <https://marketplace.recruitee.com>, <https://marketplace.tellent.com>, <https://services.tellent.com>, <https://feedback.recruitee.com> and <https://careers.tellent.com>.

**‘Usage Patterns’:** Logs and statistics of which pages, functionalities, buttons, links and forms you have used at which time;

**‘Users’:** Everyone with personalized access rights for the SaaS Products, except Referrers and Candidates;

**‘Visitors’:** Anyone that visits the Tellent Websites.