

## **The short version**

**Information We Collect** – You directly provide us with most of the information we collect when you register and/or subscribe to the site and/or the platform (together “Platform”), use it, complete forms, or register to any of our programs. We also collect information about your communications with Menthoda, as well as any of your posts on our blogs or forums and your communication with other users of Menthoda. In addition, we automatically collect information while you access, browse, do any activity through any of our features and agents including the criteria request, view or otherwise use the Platform and receive information from third party vendors or other available sources. We also collect information about you from different places on the web to help complete the setup of your profile and deliver best possible connections.

**Our Legal Basis for Using Your Personal Information** - Where relevant under applicable laws, all processing of your personal information will be justified by a "lawful ground" or “lawful purpose” for processing as detailed below.

**How Do We Use the Information Collected?** – We use personal information to provide you with quality service and security, to operate our Platform, understand how people use the Platform, and to perform our obligations to you; to ensure Platform integrity and security; to prevent fraud; to contact you and send you direct marketing communications and connections; to promote and advertise the Platform, our services and Menthoda’s Platform; to comply with lawful requests by public authorities and to comply with applicable laws and regulations.

**How Long Do We Keep Personal Information** – We will keep personal information for as long as you sign up for which it was collected.

**Children** - This Platform is offered and available to users who are at least 18 years of age and of legal age to form a binding contract.

**Sharing Personal Information with Third Parties** – We share personal information with third parties in order to operate the Platform, provide our services to you, fulfill obligations imposed on us by applicable laws and regulations, and prevent fraud, infringements and illegal activities.

**Where We Store Personal Information** - Some of the personal information you provide to us will be stored or processed on our behalf by third party suppliers and data processors and may be located in the United States and Israel.

**Cookies** - We use cookies and similar technologies (such as web beacons, pixels, tags, and scripts) to improve and personalize your experience, provide our services, analyze web Platform performance, and for marketing purposes.

**External Links** - the Platform may contain links to third-party platforms and if you link to a third-party platform from the Platform, any data you provide to that third-party platform and any use of that data by the third party are not under the control of Menthoda and are not subject to this Policy.

**Security** – We implement technical and organizational measures to maintain the security of the Platform and your personal information and to prevent unauthorized access, loss, misuse, alteration, destruction or damage to it through industry-standard technologies and internal procedures.

**Rights of EU, EEA, and UK Users** –Currently, we are not supporting European residents.

**Specific Provisions for California Residents**- If you are a California resident, you are entitled to specific privacy rights as detailed below.

**Updating Personal Information** – We take steps to ensure that the personal information we collect is accurate and up to date, and we provide you with the opportunity to update your information through your account profile settings. Please make every effort to make certain your personal information is up-to-date and accurate. In the event that you believe your information is in any way incorrect or inaccurate, please correct your profile as needed and/or let us know immediately. Incorrect information may lead to mismatched connections.

**Contact Us** - You can exercise your rights over your personal information, or contact us at [info@menthoda.com](mailto:info@menthoda.com).

The above are just the highlights. We encourage you to read more about the information we collect, how we use it, and understand the meaning of cookies and more in the long version of our Policy below.

## **The longer version**

Menthoda is committed to protecting the personal information of its users (“**users**”) as well as affiliates, influencers, and other collaborators. We believe every user has the right to know our practices regarding the information we collect when you visit and/or use the Platform. This Policy explains our privacy practices for the Platform and services provided by Menthoda and privacy practices that apply to affiliates, influencers and other collaborators who are individuals. By accessing and/or using the Platform, applications, services, goods and/or registering/subscribing for an account and/or registering/subscribing to our affiliate or influencer or similar program, you acknowledge that you understand how we process your personal data in accordance with this Policy, including our collection, use, disclosure, processing, and retention of personal information. You can also learn how to limit sharing of information in this Policy.

## **Information We Collect**

**Information You Provide.** When you register and/or subscribe to the platform, use it, complete forms, chat, participate, fill in your setup, quiz, skills tests, or surveys, use the Platform as a candidate or/and as a searcher, and/or register to our affiliate or influencer or similar program, we ask you to provide certain personal information, including a valid email address, Linkedin or Google account login details and username. We will also ask you to provide or otherwise collect additional information, such as, your name, profile details, physical address or billing information, telephone number or other contact details, transactional information, payment information (for example, in certain cases we process your payment method and credit card number), taxpayer information and forms, details about other social networks linked accounts, details about your listed gigs, purchases, education, profession and expertise, information and files uploaded by you to the Platform, and you may need to provide additional authentication information (such as copies of your government issued ID, passport, or driving license, for Verifying Your Identity). We also collect information about or contained in your communications with Menthoda as well as any of your posts on our blogs or forums and your communication with other users of Menthoda inside and outside Menthoda’s platform.

**Information We Collect Automatically.** We collect information while you access, browse, view or otherwise use the Platform. When you access Menthoda's Platform we collect personal information on your usage of the Platform, including transactions and communications and or match/leads with other users through the Platform, your searches, the pages you view, as well as other actions on the platform. We also, collect, use and process the information relating to such usage, including geo-location information, IP address, device and connection information, browser information and web-log information, and the URLs of the web pages you've viewed or engaged with before or after using the Platform. We also collect and process information relating to the use of cookies and similar technologies, as detailed below. We use that information to provide you our services, enhance user experience, personalize your browsing experience as well as monitor the Platform for preventing fraud and inappropriate content or behavior.

Additionally, in order to improve your online experience at Menthoda, we have implemented impression reporting. While you view our ads, we gather user Global Unique Identifier, HTTP request data like, user agent, IP, host, URL, country/continent from which request made, browser info, device/operating system/operating system version.

**Information We Receive from Third Parties.** We receive information from third party vendors and/or other commercially available sources, such as:

- Third-party vendors who provide us data to supplement the information we collect about you, following applicable laws. For example, we receive fraud warnings from service providers for our fraud prevention and risk assessment efforts. We also receive information from enrichment service providers to enhance and personalize your experience as well as from advertising and marketing partners in order to manage and measure our campaigns. And data providers to improve the match according to the criteria and set up
- If you link, connect, or login to your account with a third-party service (e.g. Google, Facebook, LinkedIn), we receive certain information, such as your registration and profile information from that service. This information varies and is controlled by that service or as authorized by you via your privacy settings at that service.
- If you choose to invite contacts from your G-suite directory, we will have the ability to view details of contacts, subject to your G-suite permission. We will use this data to allow you to invite your contacts to your Menthoda account. We will also use aggregated anonymised information for our internal purposes.

- If you integrate into your account information from third parties or otherwise integrate your account with third party systems, tools or products, we will receive certain information about you according to your permissions at such third parties.
- We also receive certain information about you, if you are invited to Menthoda by another user (for example, as part of our collaboration tools and referral program or through Menthoda's ambassador's link), in such case we will receive limited information, such as your email address or other contact information, and we will use it for the same purpose it was provided and in accordance with the terms of this Privacy Policy.
- We combine your users personal information with information we collect automatically or obtain from other companies and use it for the purposes detailed in this Policy.

### **Our Legal Basis for Using Your Personal Information**

Where relevant under applicable laws, all processing of your personal information will be justified by a "lawful ground" for processing. In the majority of cases, processing will be justified on the basis that:

- you have provided your consent for us to use your personal information for a specific purpose;
- our use of your personal information is necessary to perform a match and or connections
- the processing is necessary to comply with a relevant legal obligation or regulatory obligation that we have (e.g. fraud prevention); or
- the processing is necessary to support our legitimate interests as a business (e.g. to improve our services to you), subject to your interests and fundamental rights and provided it is conducted at all times in a way that is proportionate.

### **How Do We Use The Information Collected?**

We will use your personal information for the following purposes:

- We are using agents - Information from your setup will be disclosed (except for the information you don't want to share, but only for use by Menthoda's AI model to learn more about you) to other users that Menthoda's AI model chooses to connect you with.

- It will also be possible to publish your contact information (phone number and email) to users based on your subscription type. However, depending on your subscription type and level, this option can be turned off and you can choose to reveal your private information to whomever you wish.
- to provide you with quality service and security, to operate the Platform, to perform our obligations to you, and to develop and improve our service. For example, we may use personal information to verify your identity. We also use this information to establish and set up your account, verify or re-issue a password, log your activity, enable your communications with other members, provide customer support, and contact you from time to time. The information helps us to develop and improve our services, to understand and analyze our performance as well as your preferences and performance, and to customize and personalize our service and enhance your experience (including by making a "point plan" project, ranking match search results, etc.).
- to ensure platform integrity, prevent fraud, and maintain a safe and secure marketplace and services. For example, we use personal information to monitor, track, and prevent fraudulent activities and other inappropriate activities, monitor content integrity, conduct security investigations and risk assessments, verify or authenticate information provided by you, enforce our Terms of Service, and comply with applicable laws. We conduct certain behavioral analytics to achieve the above objectives and in limited cases, if we detect activity that we think poses a risk to Menthoda's platform, other users, our community, or third parties, automated processes may restrict or limit your ability to use Menthoda. If you would like to challenge any such decision, please contact us at [info@menthoda.com](mailto:info@menthoda.com).
- To contact you, as requested by you or as otherwise approved by you or permitted according to this Policy.
- To promote and advertise the Platform, our services and the Menthoda platform. For example, we use the information collected from you for the purpose of sending direct marketing messages (as detailed below), to show you information that may be of interest to you, to organize and facilitate referral programs, contests or other promotional activities or events.
- to maintain appropriate business records, to comply with lawful requests by public authorities, and to comply with applicable laws and regulations or as otherwise required by law.

We will ask for your consent before using information for a purpose other than those set out in this Policy.

Direct marketing:

- We use your personal information to send you direct marketing communications about our products, services or promotions from Menthoda that may be of interest to you or our related services. This may be via email, post, SMS, telephone or targeted online advertisements.
- Our processing of your personal information for marketing purposes is based on our legitimate interest, your consent, or as otherwise permitted according to applicable laws. You have a right to prevent direct marketing of any form at any time - this can be exercised by following the opt-out link attached to each communication or by sending an email to [info@menthoda.com](mailto:info@menthoda.com).
- We take steps to limit direct marketing to a reasonable and proportionate level, and to send you communications that we believe may be of interest or relevance to you, based on the information we have about you.

### **How Long Do We Keep Personal Information?**

We will keep personal information for as long as you sign up for which it was collected.

We apply a general rule of keeping personal information only for as long as is required to fulfil the purpose for which it was collected. However, in some circumstances, we will retain your personal information for a longer period of time. We will retain personal information for the following purposes:

- as long as it is necessary and relevant for our operations, e.g., so that we have an accurate record of your dealings with us in the event of any complaints or challenges; and
- in relation to personal information from closed accounts to comply with applicable laws, prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigation, enforce our Platform terms and take other actions as permitted by law.

### **Children**

This platform is offered and available to users who are at least 18 years of age or older and of legal age to form a binding contract.

### **Sharing Personal Information with Third Parties**

We do not sell or rent your personal information to third parties for their marketing purposes without your explicit consent.

We share your personal information with third parties as detailed below:



- *With other users and Platform visitors.* Once you register and/or subscribe, your username, country, and additional information regarding your activity is made public and is visible to all users of the Platform. This information includes photos you upload, your portfolio (setup), general information, ratings, and additional information you may choose to add to your profile. We also may offer you the opportunity to participate and post content publicly in forums, blogs and on other similar features. Please be aware that certain information, such as your user name and profile, together with the content uploaded by you, will be publicly displayed when you use such features (in different subscriptions plan you may get the option to control it).

Your information will also be shared with other users when we find you a potential match, when we find you as a potential match for another user who searches, or when Menthoda would like to suggest you as a potential connection to another user. When you publish your information and/or share your data with other Menthoda's users, you do so at your own risk. If you choose to share any other personal information with users, it's at your own risk. Menthoda does not share personal information before at least one side approved the match

*With Service Providers.* We share personal information for business purposes with service providers that provide us with services for the purpose of operating the Platform, opening and operating your account as well as providing ancillary services and solutions. These include, among others, hosting services, billing and payment processors and vendors, CRM systems, forum hosting, community management services, data and cybersecurity services, web analytics and performance tools, translation tools, IT SaaS services, session recording, communication systems, mailing systems, data optimization and marketing services, data enrichment services, legal and financial advisors or technical consultants. Consistent with applicable legal requirements, we take appropriate technical and organizational measures to require third parties to adequately safeguard your personal information and only process it in accordance with our instructions;

- *For legal reasons.* We share personal information with law enforcement agencies, public authorities, or other parties in order to respond to a subpoena or court order, judicial process, or to regulatory authorities if we believe we are required to do so by law, or that doing so is reasonably necessary to comply with legal processes; when we believe it necessary or appropriate to disclose personal information to law enforcement authorities, such as to investigate actual or suspected fraud or violations of law, breaches of security, or breaches



of this Policy; to respond to claims against us; and to protect the rights, property, or personal safety of Fiverr, our customers, or the public;

- *For payments and fraud detection.* We share personal information with payment processors, fraud detection agencies and similar third parties for the purpose of facilitating payments done via the Platform and securing the Platform and protecting it against fraud, unauthorized transactions (such as money laundering), claims or other liabilities.
- *With social media partners.* Our Platform includes certain social media features, including single sign on features. We also share limited personal information with such social media platforms and marketing partners, such as Facebook and Google, to promote our services or the Menthoda's marketplace. Such features and third party services collect certain information about you and may set a cookie to enable their functionality. Such third parties' features are governed by their policies.
- *With users with whom you interact.* We share personal information to help facilitate interactions between users. For example, if you are an optional candidate we may share certain information about you with the Searcher to ensure a good connection for both sides
- *With our corporate affiliates and ambassadors.* We share limited information with Menthoda's corporate affiliates that are related by common control for the purpose of operating the Platform, providing our services to you and for other purposes users; and
- *In the context of a corporate transaction.* Personal information will also be disclosed if we go through a business transition such as a merger, sale, transfer of all or a portion of Menthoda's assets, acquisition, bankruptcy or similar event. In the event that we sell any business or assets, we will disclose your data to the prospective buyer. If we or substantially all of our assets are acquired by a third party, information held by us about our users will be one of the transferred assets.

## **Where We Store Your Personal Information**

Currently, we are not supporting European residents

## **Cookies**

We use cookies and similar technologies (such as web beacons, pixels, tags, and scripts) to improve and personalize your experience, provide our services, analyze webPlatformperformance and for marketing purposes.

## **External Links**

Please note that the Platform contains links to third party Platforms and if you navigate to a third party Platform from the Platform, any data you provide to that Platform and any use of that data by the third party are not under the control of Menthoda and are not subject to this Policy. You should consult the privacy policies of each Platform you visit. This Policy applies solely to personal information collected by our Platform. If you upload content, including personal information, to a social network and then tag the Platform, your submission will be subject to that social network's terms of use and privacy policy, even where you post on an official Menthoda's page on the social network. We do not have control over these terms of use and privacy policies and have not reviewed their adequacy. You should therefore review these before submitting any personal information.

## **Security**

We implement technical and organizational measures to maintain the security of the Platform, our services and personal information and in preventing unauthorized access, loss, misuse, alteration, destruction or damage to it through industry standard technologies and internal procedures. In addition, we contractually ensure that any third party processing your personal information equally provides for confidentiality and integrity of your data in a secure way. However, the transmission of data via the internet is not completely secure, and although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to the Platform. Once we have received your data, we will use strict procedures and security features to try to prevent unauthorized access. Users who have registered to the Platform agree to keep their password in strict confidence and not disclose such password to any third party.

## **Rights of EU, EEA and UK Users**

Currently we are not supporting European residents

## **Specific Provisions for California Residents**

This section of the Policy applies to you, if you are a California resident.

During the last twelve (12) months we have collected the following categories of personal information from users:

- Information that you chose to upload or otherwise provided by you to Fiverr, which may include: (i) Identifiers and personal information, such as name, postal addresses, online identifiers, email addresses, passport number or driving license number, social security number; (ii) characteristics of protected classifications, such as gender; facial image; audio, electronic or similar information; (iii) professional or employment-related information; (iv) education information; (v) commercial information; (vi) Audio or other sensory information, for example if you provide audio-based services on Fiverr.
- Information we collect when you use Fiverr, including (i) Identifiers and personal information, such as online identifiers, internet protocol (IP) addresses, access device and connection information such as browser type, version, and time zone setting and browser plug-in types and versions; (ii) commercial information, including products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies; (iii) Internet or other electronic network activity information, including, but not limited to log-in and log-out time, the duration of sessions, the content uploaded and downloaded, viewed web-pages or specific content on web-pages, activity measures; (iv) Location information.
- Information that we collect or receive from third parties, such as service providers, advertisers, and third-party accounts you link with Fiverr, including: (i) Identifiers and personal information, such as name, online identifiers, email addresses, internet protocol (IP) addresses, access device and connection information such as browser type, version, and time zone setting and browser plug-in types and versions; (ii) Professional or employment-related information; (iii) Internet or other electronic network activity information, including, but not limited to log-in and log-out time, the duration of sessions, the content uploaded and downloaded, viewed web-pages or specific content on web-pages, activity measures; (iv) Commercial information; and (v) Location information.
- Inferences drawn from any of the information identified above to create a profile about you.

We use the personal information that we collect or receive for the business purposes as described above under the Section titled “How Do We Use the Information Collected?”.

We may disclose the above listed categories of personal information to third parties for business purposes as described above under the Section titled “Sharing Personal

Information with Third Parties” in the Privacy Policy. In the preceding twelve (12) months, we have disclosed all the categories of personal information detailed above for business purposes.

As previously mentioned in this Policy, we do not “sell” (as such term is defined in the CCPA) personal information.

You are entitled to the following specific rights under the CCPA, subject to certain exceptions, in relation to personal information related to you:

- You have a right to request access to the personal information we have collected about you over the past 12 months, including: (i) the categories of personal information we collect about you; (ii) the categories of sources from which the personal information is collected; (iii) the business or commercial purpose for collecting your personal information; (iv) the categories of third parties with whom we have shared your personal information; (v) the specific pieces of personal information that we have collected about you.
- You have a right to request that we delete personal information related to you that we collected from you under certain circumstances and exceptions.
- You also have a right not to be discriminated against for exercising your rights under the CCPA.
- You also have a right to submit your request via an authorized agent. If you use an authorized agent to submit a request to access or delete your personal information on your behalf, the authorized agent must: (1) be a person or business entity registered with the California Secretary of State to conduct business in California; (2) provide proof of such registration; and (3) provide documentation or other proof indicating that they are authorized to act on your behalf. We may also require you to verify your identity directly with us, and directly confirm with us that you provided the authorized agent permission to submit the request.

To make such requests, we kindly ask that you sent such a request to Customer Relations ticket here: [info@menthoda.com](mailto:info@menthoda.com).

A request for access can be made by you only twice within a 12-months period. Any disclosures that we provide will only cover the 12-months period preceding receipt of your request. We do not charge a fee to process or respond to your verifiable User request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will inform you of the reasons for such decision and provide you with a cost estimate before processing further your request.

## Updating Personal Information

We take steps to ensure that the personal information we collect is accurate and up to date, and we provide you with the opportunity to update your information through your account profile settings. In the event that you believe your information is in any way incorrect or inaccurate, please make sure you keep checking and updating your profile. If for any reason you have a problem with deleting or updating your personal information, please contact Menthoda Customer Support and we will make reasonable efforts to delete any such information pursuant to any applicable privacy laws.

You can review and change your personal information by logging into the Platform and visiting your account profile page.

If you delete your User Generated Content (“UGC”), as defined in the Menthoda Terms of Service, from the Platform, copies of your UGC may remain viewable in cached and archived pages, or might have been copied or stored by other Platform users. Proper access and use of information provided on the Platform, including UGC, is governed by our Terms of Service.

## Contact Us

To exercise any of your rights in connection with your personal information, we kindly ask that you send an E-mail to [privacy@menthoda.com](mailto:privacy@menthoda.com). Please include all the relevant details, so your ticket can be handled correctly. We will process any requests in line with any local laws and our policies and procedures.

If you have any questions (or comments) concerning this Policy, please email our team at [privacy@menthoda.com](mailto:privacy@menthoda.com), and we will make an effort to reply within a reasonable timeframe..