



Intrro Privacy Policy

Effective Date of Current Policy: 1st January 2020

1. Purpose

This Privacy Policy is incorporated by reference into the Intrro Terms of Service (the “**Terms**”). The terms “Intrro” “we,” and “us” include Ehalah FZ-LLC and our affiliates and subsidiaries. This Privacy Policy explains our information practices, the kinds of information we may collect, how we intend to use and share that information, and how you can opt out of a use or correct or change such information. All other terms not defined in Section 11 or otherwise herein will have the meanings set forth in the Terms.

2. Scope

This Privacy Policy applies to Personal Information that is Processed by Intrro in the course of our business, including on Intrro websites (each a “**Site**” or “**Sites**”), mobile applications, blogs, and other online offerings (collectively, the “**Services**”). All individuals whose responsibilities include the Processing of Personal Information on behalf of Intrro are expected to protect that data by adherence to this Privacy Policy.

3. Transparency/Notice—Types of Personal Information We Collect and How We Use It

The types of Personal Information we may collect (directly from you or from Third-Party sources) and our privacy practices depend on the nature of the relationship you have with Intrro and the requirements of applicable law. Some of the ways that Intrro may collect Personal Information include:

- You may provide Personal Information directly to Intrro through signing up for Intrro or interacting with and using the Services.
- As you navigate the Services, certain passive information may also be collected about your visit, including through cookies and similar technologies as described below.
- Intrro may also independently collect, Process and store information about you from Third-Party sources.



We endeavor to collect only that information which is relevant for the purposes of Processing. Below are the ways we collect Personal Information and how we use it.

3.1. Types of Personal Information We Collect

Intrro collects Personal Information regarding its current, prospective, and former clients, customers, users, visitors, and guests (collectively “**Individuals**”).

- **Information You Provide Directly to Us.** When you use the Services or engage in certain activities, such as signing up for Intrro, requesting Services or information, or contacting us directly, we may ask you to provide some or all of the following types of information:
 - **Signing up for Intrro** When you sign up to use Intrro, we collect basic contact information from you such as your name, email address and work title. You may also share or export your contacts list as described below in “Information Submitted Via the Services.”
 - **Communications with Us.** We may collect Personal Information from you such as email address, phone number or mailing address when you choose to request information about our Services, register for Intrro’s newsletter, request to receive customer or technical support, or otherwise communicate with us.
 - **Posting on the Services.** Intrro may offer publicly accessible web pages, blogs, private messages, or community forums. You should be aware that, when you disclose information about yourself in on Intrro’s web pages, blogs, private messages, and community forums, the Services will collect the information you provide in such submissions, including any Personal Information. If you choose to submit content to any public area of the Services, such content will be considered “public” and will not be subject to the privacy protections set forth herein.
 - **Automatic Data Collection.** We may collect certain information automatically through our Services or other methods of web analysis, such as your Internet protocol (IP) address, cookie identifiers, mobile carrier, mobile advertising



identifiers, MAC address, IMEI, Advertiser ID, and other device identifiers that are automatically assigned to your computer or device when you access the Internet, browser type and language, geo-location information, hardware type, operating system, Internet service provider, pages that you visit before and after using the Services, the date and time of your visit, the amount of time you spend on each page, information about the links you click and pages you view within the Services, and other actions taken through use of the Services such as preferences.

- **Information Submitted Via the Services.** Intro allows you to share your contacts and friends lists from various sources with us. We collect and Process this information to help you and your employer assess whether or not these individuals may be a good candidate for any job openings within the organization. Please note that you are solely responsible for ensuring that your collection and the Processing of this information does not violate the legal rights of individuals or other third parties. You will obtain any and all authorizations and lawful bases for Processing (including consent where necessary) prior to uploading this information to Intro.

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3.2. How Intro Uses Your Information

We acquire, hold, use, and Process Personal Information about Individuals for a variety of business purposes, including:

- **To Provide Products, Services, or Information Requested.** Intro may use information about you to fulfill requests for products, Services, or information, including information about potential or future Services, including to:
 - Generally, manage Individual information and account;
 - Help you and your employer match your contacts to job openings and assist you in contacting these candidates;
 - Respond to questions, comments, and other requests;
 - Provide access to certain areas, functionalities, and features of Intro's Services;



- Contact you to answer requests for customer support or technical support;
- Allow you to register for events.
- **Administrative Purposes.** Intro may use Personal Information about you for its administrative purposes, including to:
 - Measure interest in Intro’s Services;
 - Develop new products and Services;
 - Ensure internal quality control;
 - Verify Individual identity;
 - Communicate about Individual accounts and activities on Intro’s Services and systems, and, in Intro’s discretion, changes to any Intro policy;
 - Send an email to the email address you provide to us to verify your account and for informational and operational purposes, such as account management, customer service, or system maintenance;
 - Process payment for products or Services purchased;
 - Process applications and transactions;
 - Prevent potentially prohibited or illegal activities;
 - Enforce our Terms.

You may contact us at any time to opt out of the use of your Personal Information, as further described in Section 5 below.

- **Research and Development.** Intro may use Personal Information alone or in the aggregate with information obtained from other sources, in order to help us to optimally deliver our existing products and Services or develop new products and Services. We may share anonymous Individual and aggregate data for research and analysis purposes.
- **Services via Mobile Devices.** From time to time, Intro may provide Services that are specifically designed to be compatible and used on mobile devices. Intro will collect certain



information that your mobile device sends when you use such Services, like a device identifier, user settings, location information, mobile carrier, and the operating system of your device. Mobile versions of Intro's Services may require that users log in with an account. In such cases, information about the use of mobile versions of the Services may be associated with accounts. In addition, Intro may enable Individuals to download an application, widget, or other tools that can be used on mobile or other computing devices. Some of these tools may store information on mobile or other devices. These tools may transmit Personal Information to Intro to enable Individuals to access accounts and to enable Intro to track use of these tools. Some of these tools may enable users to email reports and other information from the tool. Intro may use personal or non-identifiable information transmitted to Intro to enhance these tools, to develop new tools, for quality improvement and as otherwise described in this Privacy Policy or in other notices Intro provides.

- **Anonymous and Aggregated Information Use.** Intro may use Personal Information and other information about you to create anonymized and aggregated information, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access Intro's Services or other analyses we create. Anonymized and aggregated information are used for a variety of functions, including the measurement of visitors' interest in and use of various portions or features of the Services. Anonymized or aggregated information is not Personal Information, and Intro may use such information in a number of ways, including research, internal analysis, analytics, and any other legally permissible purposes. We may share this information within Intro and with Third-Parties for our or their purposes in an anonymized or aggregated form that is designed to prevent anyone from identifying you.
- **Sharing Content with Friends or Colleagues.** Intro's Services may offer various tools and functionalities. For example, Intro allows you to send communications to colleagues,



contacts, and friends which include information about job openings for which your colleagues, contacts, and friends may be a good candidate.

- **Other Uses.** Intro may use Personal Information for which we have a legitimate interest, such as direct marketing, research (including marketing research), network and information security, fraud prevention, or any other purpose disclosed to you at the time you provide Personal Information or with your consent.

3.3. Cookies, Pixel Tags/Web Beacons and Analytics Information

We, as well as Third-Parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, local storage, and other technologies (“**Technologies**”) to automatically collect information through the Services. We use Technologies that are essentially small data files placed on your computer, tablet, mobile phone, or other devices (referred to collectively as a “**device**“) that allow us to record certain pieces of information whenever you visit or interact with our Sites, Services, applications, messaging, and tools, and to recognize you across devices.

- **Cookies.** Cookies are small text files placed in visitors’ computer browsers to store their preferences. Most browsers allow you to block and delete cookies. However, if you do that, the Site may not work properly.
- **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded on the Site that collects information about users’ engagement on that web page. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement.
- **Social Media Widgets.** Our Site and Services include social media features such as the Facebook “Like” button and LinkedIn (that might include widgets such as the share this button or other Interactive Mini-Programs). These features may collect your IP address, which page you are visiting on our Site, and may set a cookie to enable the feature to function properly. These social media features are either hosted by a Third-Party or hosted



directly on our Site. Your interactions with these features are governed by the privacy policy of the company providing it.

- **Analytics.** We may also use Google Analytics and Google Analytics Demographics and Interest Reporting to collect information regarding visitor behavior and visitor demographics on some of our Services and to develop website content. This analytics data is not tied to any Personal Information. For more information about Google Analytics, please visit www.google.com/policies/privacy/partners/. You can opt out of Google's collection and Processing of data generated by your use of the Services by going to <http://tools.google.com/dlpage/gaoptout>.

Our uses of such Technologies fall into the following general categories:

- **Operationally Necessary.** We may use cookies, web beacons, or other similar technologies that are necessary to the operation of our Sites, Services, applications, and tools. This includes technologies that allow you access to our Sites, Services, applications, and tools; that are required to identify irregular Site behavior, prevent fraudulent activity and improve security; or that allow you to make use of our functions such as shopping carts, saved search, or similar functions;
- **Performance Related.** We may use cookies, web beacons, or other similar technologies to assess the performance of our Sites, applications, Services, and tools, including as part of our analytic practices to help us understand how our visitors use our Sites, determine if you have interacted with our messaging, determine whether you have viewed an item or link, or to improve our Site content, applications, Services, or tools;
- **Functionality Related.** We may use cookies, web beacons, or other similar technologies that allow us to offer you enhanced functionality when accessing or using our Sites, Services, applications, or tools. This may include identifying you when you sign into our Sites or keeping track of your specified preferences, interests, or past items viewed so that we may enhance the presentation of content on our Sites;



If you would like to opt out of the Technologies we employ on our Sites, Services, applications, or tools, you may do so by blocking, deleting, or disabling them as your browser or device permits.

3.4. Third-Party Websites And Social Media Platforms

The Services may contain links to other websites and other websites may reference or link to our Services. These other domains and websites are not controlled by us, and Intro does not endorse or make any representations about Third-Party websites or social media platforms. We encourage our users to read the privacy policies of each and every website and application with which they interact. We do not endorse, screen or approve, and are not responsible for the privacy practices or content of such other websites or applications. Visiting these other websites or applications is at your own risk.

Intro's Services may include publicly accessible blogs, community forums, or private messaging features. The Services may also contain links and interactive features with various social media platforms (e.g., widgets). If you already use these platforms, their cookies may be set on your device when using our Site or other Services. You should be aware that Personal Information which you voluntarily include and transmit online in a publicly accessible blog, chat room, social media platform or otherwise online, or that you share in an open forum may be viewed and used by others without any restrictions. We are unable to control such uses of your information when interacting with a social media platform, and by using such services you assume the risk that the Personal Information provided by you may be viewed and used by Third-Parties for any number of purposes.

4. Onward Transfer—Intro May Disclose Your Information

4.1. Information We Share

We may share your information as described in this Privacy Policy (e.g., with our Third-Party service providers; to comply with legal obligations; to protect and defend our rights and property) or with your permission.

- **Your Employer.** When you sign up for Intro, you may have done so because your employer instructed us to send you an invite. Please be aware that your employer will have access to the information that you share with Intro, including any contacts lists because we will share that information with your employer. Your employer may use this information to



search for qualified candidates to fill job openings. Please check separately with your employer about its privacy practices and information handling standards.

- **We Use Vendors and Service Providers.** We may share any information we receive, with vendors and service providers. The types of service providers to whom we entrust Personal Information include service providers for: (i) provision of IT and related services; (ii) provision of information and services you have requested; (iii) payment processing; (iv) customer service activities; and (v) in connection with the provision of the Site.
- **Business Partners.** Intro may share Personal Information with our business partners, and affiliates for our and our affiliates' internal business purposes or to provide you with a product or Service that you have requested. Intro may also provide Personal Information to business partners with whom we may jointly offer products or Services, or whose products or services we believe may be of interest to you. In such cases, our business partner's name will appear, along with Intro. Intro requires our affiliates and business partners to agree in writing to maintain the confidentiality and security of Personal Information they maintain on our behalf and not to use it for any purpose other than the purpose for which Intro provided them.
- **Displaying to Other Users.** The content you post via the Services may be displayed to others. For example, Intro may allow you to send an email or message to a colleague, contact or friend. The recipient will be able to see publicly available information associated with you when you communicate with them. We are not responsible for privacy practices of the other users who will view and use this information.
- **Disclosures to Protect Us or Others (e.g., as Required by Law and Similar Disclosures).** We may access, preserve, and disclose your Personal Information, other account information, and content, if we believe doing so, is required or appropriate to: (i) comply with law enforcement or national security requests and legal processes, such as a court order or subpoena; (ii) respond to your requests; (iii) protect yours', ours' or others' rights, property, or safety; (iv) to enforce Intro policies or contracts; (v) to collect amounts



owed to Intrro; (vi) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity; or (vii) if we, in good faith, believe that disclosure is otherwise necessary or advisable.

- **Merger, Sale, or Other Asset Transfers.** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, a sale of company assets, or transition of service to another provider, then your information may be sold or transferred as part of such a transaction as permitted by law and/or contract. In such event, Intrro will endeavor to direct the transferee to use Personal Information in a manner that is consistent with the Privacy Policy in effect at the time such Personal Information was collected.

4.2. International Data Transfers

You agree that all Personal Information submitted to, collected via or by Intrro may be transferred, Processed, and stored anywhere in the world, including but not limited to, the European Union, The Middle East, The United States, in the cloud, on our servers, on the servers of our affiliates or the servers of our service providers in order to provide the Services.

5. Opt Out (Right To Object To Processing)

5.1. General

You have the right to object to and opt out of certain uses and disclosures of your Personal Information. Where you have consented to Intrro's Processing of your Personal Information you may withdraw that consent at any time and opt out to further Processing by contacting help@intrro.com. Even if you opt out, we may still collect and use non-Personal Information regarding your activities on our Sites and/or information from the advertisements on Third-Party websites for non-interest based advertising purposes, such as to determine the effectiveness of the advertisements.

5.2. Email and Telephone Communications

If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. We will process your request within a reasonable



time after receipt. Note that you will continue to receive transaction related emails regarding products or Services you have requested. We may also send you certain non-promotional communications regarding Intro and our Services and you will not be able to opt out of those communications (e.g., communications regarding updates to our Terms or this Privacy Policy).

5.3. “Do Not Track”

Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. DNT is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

5.4. Cookies and Interest-Based Advertising

As noted above, you may stop or restrict the placement of cookies on your computer or remove them from your browser by adjusting your web browser preferences. Please note that cookie-based opt-outs are not effective on mobile applications. However, on many mobile devices, application users may opt out of certain mobile ads via their device settings.

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from our data partners and our other advertising partners that participate in self-regulatory programs. You can access these, and also learn more about targeted advertising and consumer choice and privacy, at www.networkadvertising.org/managing/opt_out.asp, or <http://www.youronlinechoices.eu/> and www.aboutads.info/choices/. You can also choose not to be included in Google Analytics here.

To be clear, whether you are using our opt-out or an online industry opt-out, these cookie based opt-outs must be performed on each device and browser that you wish to have opted out. For example, if you have opted out on your computer browser, that opt-out will not be effective on your mobile device. You must separately opt out on each device. Advertisements on Third-Party websites that contain the AdChoices link and that link to this Privacy Policy may have been directed to you based on anonymous, non-Personal Information collected by advertising partners over time and across websites. These advertisements provide a mechanism to opt out of the advertising partners’ use of this information for interest-based advertising purposes.

6. Rights of Access, Rectification, Erasure, and Restriction



You may inquire as to whether Intrro is Processing Personal Information about you, request access to Personal Information, and ask that we correct, amend or delete your Personal Information where it is inaccurate. Where otherwise permitted by applicable law, you may send an email to help@Intrro.com or use any of the methods set out in this Privacy Policy to request access to, receive (port), seek rectification, or request erasure of Personal Information held about you by Intrro. Please include your full name, email address associated with your account, and a detailed description of your data request. Such requests will be processed in line with local laws.

Although Intrro makes good faith efforts to provide Individuals with access to their Personal Information, there may be circumstances in which Intrro is unable to provide access, including but not limited to: where the information contains legal privilege, would compromise others' privacy or other legitimate rights, where the burden or expense of providing access would be disproportionate to the risks to the Individual's privacy in the case in question, where the request is manifestly unfounded or excessive, or where it is commercially proprietary. If Intrro determines that access should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries. To protect your privacy, Intrro will take commercially reasonable steps to verify your identity before granting access to or making any changes to your Personal Information.

7. Data Retention

Intrro retains the Personal Information we receive as described in this Privacy Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

8. Security of Your Information

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us. We do not accept liability for unintentional disclosure. By using the Services or providing Personal Information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on the Site or sending an email to you. You may have a legal right to receive this notice in writing.



9. Redress/Compliance and Accountability

If you have any questions about our privacy practices, this Privacy Policy, or how to lodge a complaint with the appropriate authority, please contact Intrro by email at help@intrro.com. We will address your concerns and attempt to resolve any privacy issues in a timely manner.

10. Other Rights and Important Information

10.1. Changes To Our Privacy Policy and Practices

This Privacy Policy may change from time to time. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you use the Services after the updated Privacy Policy is posted on the Services. If at any point you do not agree to any portion of the Privacy Policy then in effect, you must immediately stop using the Services.

- **Revision to the Privacy Policy.** We may revise this Privacy Policy in our sole discretion, so review it periodically. If you continue to visit this Site and use the Services made available to you after such changes have been made, you hereby provide your consent to the changes.
- **Posting of Revised Privacy Policy.** If there are any material changes to this Privacy Policy, Intrro will notify you by email or as otherwise required by applicable law. We will post any adjustments to the Privacy Policy on our Site, and the revised version will be effective immediately when it is posted (or upon notice as applicable). If you are concerned about how your information is used, bookmark this page and read this Privacy Policy periodically.
- **New Uses of Personal Information.** Additionally, before we use Personal Information for any new purpose not originally authorized by you, we will endeavor to provide information regarding the new purpose and give you the opportunity to opt out. Where consent of the Individual for the Processing of Personal Information is otherwise required by law or contract, Intrro will endeavor to comply with the law or contract.

11. Definitions

The following capitalized terms shall have the meanings herein as set forth below.



- “Agent” means any Third-Party that Processes Personal Information pursuant to the instructions of, and solely for, Intrro or to which Intrro discloses Personal Information for use on its behalf.
- “Personal Information” is any information relating to an identified or identifiable natural person (“Individual”).
- “Process” or “Processing” means any operation which is performed upon Personal Information, whether or not by automatic means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
- “Third-Party” is any company, natural or legal person, public authority, agency, or body other than the Individual, Intrro or Intrro’s Agents.