

Last updated: September 2023

**Silk Technologies, Inc. and its affiliates (Silk)**  
**Job Applicant Privacy Notice**

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**Introduction**

Silk (the “**Company**”, “**we**”, “**us**”, “**our**”), respects the privacy and data protection rights of our job applicants.

This privacy notice (“**Notice**”) describes the personal information we have about you as a job applicant and your rights concerning that information. It also explains the policies and procedures we use regarding your personal information during our selection and recruitment process.

This Notice may be amended from time to time. We will post any change to this Notice on our website, a reasonable time in advance of the effective date of the change. If we have your email on record, we will also proactively email you if we make material changes to this Notice.

The entity primarily responsible for your personal information is the Silk corporate entity where the position you apply for is located as referenced in the following table:

Location	Name	Address
US	Silk Technologies Inc	75 Second Avenue 6th Floor, Suite 620 Needham, MA 02494 US
Israel	The Silk Technologies	Ha-Otsma 1 North Hi-Tech Park, POB 569

	ILC Ltd	Yokneam 2069206 Israel
<b>UK</b>	Silk Technologies UK Ltd	37 Broadhurst Gardens London NW6 3QT UK

We can be contacted at [candidates@silk.us](mailto:candidates@silk.us)

### Purposes of Processing your Personal Information

We collect and process personal information about job applicants like you for the purpose of conducting a proper recruitment process, assessing how suitable you are for the position, deciding whether to hire you and, where relevant, preparing to enter into an employment agreement with you.

In extraordinary cases, we will also use the information we collect to handle complaints and lawsuits relating to your candidacy. For example, if you or a third-party file a complaint or a lawsuit about our handling of your candidacy, or if we need to file a complaint or a lawsuit relating to your candidacy to protect our legal rights.

We also process your personal information to consider you for future openings at the Company and our corporate group affiliates, other than the specific position to which you initially apply. For example, we may contact you later if a similar position subsequently becomes available, which we believe may be relevant for you.

### Personal Information We Collect

Your personal information as a job applicant includes your name, contact details, address, qualifications, skills, hobbies and leisure activities, employment history, experience and education history, information presented in your resume/CV (Curriculum Vitae) or cover letter, your employment preferences, your right to work in the country in question, photos and links to webpages or websites you operate online, performance in home-assignment, and additional information obtained in your interviews.

We also collect additional information that you choose to share with us, such as your current and historic salary information and salary expectations. If you voluntarily provide us with information about your gender, racial or ethnic origin, or health condition, we will also process that information.

We also collect the names and contact details of your application references, as well as information we receive through reference letters or in our discussions with those references. It is your responsibility to obtain consent from those you provide as references before you give us their contact information.

You are not under any legal obligation to provide us with your personal information. However, we will not be able to consider your application for the position without this information (with the exception of information you voluntarily choose to provide us).

We also obtain information about you from other third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks (where permitted by law).

We do not recruit or employ individuals under the age of 18. We do not knowingly collect personal information about individuals under that age.

### Methods and Sources for Collecting your Personal Information

The Company collects the information from several sources:

- Directly from you as an applicant, through documents you provide us, application forms you complete, and interviews we conduct with you.
- Recruiters and recruitment or placement agencies.
- References and past employers.
- Publicly accessible sources, such as LinkedIn and Facebook, where information about you is publicly available.
- Background check, if you are an applicant in the United States and you have consented to such a check.
- The Company also uses applicant screening assessment tests and questionnaires that we will ask you to complete. The information, results and assessments obtained through these tools relate to your skills, characteristics, hobbies, and leisure activities. The Company will use these to evaluate if you are suitable for the position and the Company.

### Data Retention and Future Use

Whether we can find a position for you at Silk or not, we prefer to retain your information for the purpose of considering you for another potential job opening, and in case the information is necessary to handle legal claims related to the application.

You will be prompted to agree to our data retention request of your personal information during the application process. Your response to this question will not impact your candidacy.

Should you decline the prompt, Silk will retain your information for only 36 months after your date of application.

## Sharing Your Personal Information

First and foremost, your information will be shared with our Human Resources and recruitment team, the manager overseeing the position to which you are applying, and at times, also other members of the team to which the position you are applying belongs.

We will also share some of your information with outside parties that we hire to provide services relating to the purposes mentioned above, such as screening and placement agencies, external advisors, and relevant service providers (such as Comeet). These parties are required to implement measures to safeguard your personal information.

Because we operate our business as an affiliated group of companies, we sometimes also share your information with companies in our corporate group for the same purposes listed above.

If the operation of our business is organized within a different framework, or through another legal structure or entity (such as due to a merger or acquisition), we will share your information with the target entity of the merger, acquisition, or reorganization, and with legal counsels, and advisors. We do so for the purpose of facilitating the structural change in the operation of our business.

In the extraordinary case of complaints and lawsuits relating to your candidacy, we will also share your information with our general counsel and outside legal counsel.

If a law or binding order requires us to, we will disclose your personal information to the parties required under the law or order.

If a recruiting firm introduced your candidacy to the Company, and you successfully complete the recruitment process and are hired, we will provide the recruiting firm an indication of your successful candidacy and your expected salary. This is necessary for charging the finder's fee that the Company pays the recruiting firm.

In any case, we do not sell your personal information to third parties.

## Information Security

We implement measures designed to secure your personal information and protect it from unauthorized disclosure, use or copying. We also require all those who have access to your personal information to implement such measures. However, although efforts are made to secure the applicant's personal information, we cannot guarantee its absolute protection.

[Additional information for job applicants in the EEA or UK](#)

Purposes	Legal Basis
<b>Recruitment: Reviewing your candidacy for an open position you applied for</b>	<ul style="list-style-type: none"><li>• Our legitimate interests in properly reviewing your candidacy and making a recruitment decision.</li><li>• Steps necessary before entering into an employment contract with you.</li></ul>
<b>Defending or asserting legal claims relating to your candidacy</b>	Our legitimate interests in asserting or defending legal claims that impact the course of our business or reputation.
<b>Retaining your candidacy for future positions beyond the ones you applied for</b>	Our legitimate interests in considering you for other job openings we may have
<b>Charging the finder's fee that the Company pays the recruiting firm</b>	Our legitimate interests in performing the "finder's" agreement we have with the recruiting firm.

**International data transfers.** If we transfer your Information from within the EEA or UK to other jurisdictions outside the EEA or UK, this will be done under either to a country with an EU and UK adequacy recognition, or under the terms of a data transfer agreement which contain standard data protection contract clauses with adequate safeguards determined by the EU Commission and the UK ICO.

**Data subject rights.** If you are in the EEA or UK, you have the following rights under the GDPR:

**Right to Access** and receive a copy of your personal information that we process.

**Right to Rectify** inaccurate personal information we have concerning you and to have incomplete personal information completed.

**Right to Object** to our processing of your personal information on the basis of our legitimate interest. However, we may override the objection if we demonstrate compelling legitimate grounds, or if we need to process such personal information for the establishment, exercise or defense of legal claims.

**Right to Restrict** us from processing your personal information (except for storing it): (a) if you contest the accuracy of the personal information (in which case the restriction applies only for a

period enabling us to determine the accuracy of the personal information); (b) if the processing is unlawful and you prefer to restrict the processing of the personal information rather than requiring the deletion of such data by us; (c) if we no longer need the personal information for the purposes outlined in this Notice, but you require the personal information to establish, exercise or defend legal claims; or (d) if you object to our processing based on our legitimate interest (in which case the restriction applies only for the period enabling us to determine whether our legitimate grounds for processing override yours).

**Right to be Forgotten.** Under certain circumstances, such as when our processing of your personal information is no longer necessary, you have the right to ask us to erase your personal information. However, notwithstanding such request, we may still process your personal information if it is necessary to comply with our legal obligations, or for the establishment, exercise or defense of legal claims.

If you wish to exercise any of these rights, contact us through the channels listed below.

When you contact us, we reserve the right to ask for reasonable evidence to verify your identity before we provide you with information. Where we are not able to provide you with information that you have asked for, we will explain the reason.

Subject to applicable law, you have the right to lodge a complaint with your local data protection authority. If you are in the EU, then according to Article 77 of the GDPR, you can lodge a complaint to the supervisory authority, in the Member State of your residence, place of work or place of alleged infringement of the GDPR. For a list of supervisory authorities in the EU, click [here](#).

If you are in the UK, you can lodge a complaint to the Information Commissioner’s Office (ICO) pursuant to the instructions provided [here](#).

### [Additional Information for Individuals Residing in California](#)

If you are an individual residing in California, we provide you with the following information pursuant to the California Privacy Rights Act (CPRA). This is also the information we have collected in the past 12 months.

We do not sell your personal information and have not done so in the past 12 months.

We also do not share your personal information for online behaviorally targeted ads and have not done so in the past 12 months.

Categories of Personal Information	Specific Types of Personal Information Collected	Business or commercial purposes pursuant to the CPRA	Specific Details on the Business Purpose
Identifiers	Name, email address, phone number, residential		

	address, photograph, contact information of references.		
Information that identifies, relates to, describes, or is capable of being associated with, a particular individual	Date of birth and your LinkedIn profile information, information presented in your resume/CV (Curriculum Vitae) or cover letter, your right to work in the U.S.	<ul style="list-style-type: none"> <li>• Auditing related to a current interaction with you</li> <li>• Detecting security incidents and protecting against malicious, deceptive, fraudulent or illegal activity</li> </ul>	<ul style="list-style-type: none"> <li>• Recruitment – Reviewing your candidacy for the open position you applied for</li> <li>• Defending or asserting legal claims relating to your candidacy</li> <li>• Managing the Company’s ongoing business</li> <li>• Retaining your candidacy for future positions beyond the ones you applied for compensation and payroll</li> </ul>
Professional employment-related information or	Details of professional qualifications and skills, employment history, job preferences, current and prior salary information together with salary expectations, details of your current benefit entitlements and other information you provide in connection with your job application, in your curriculum vitae (résumé) and in your cover letter, references, background check and criminal records information.	<ul style="list-style-type: none"> <li>• Exercising or defending our legal rights and the rights of our employees, customers, and agents</li> <li>• Administration of our operations, including for safety purposes</li> <li>• Compliance with applicable laws and regulations</li> </ul>	
Education information	Your professional education		
Characteristics of protected classifications under California or federal law	Gender, racial or ethnic origin, health condition.  These are considered sensitive information under the CPRA. We do not use or disclose this sensitive personal information for purposes other than those specified in the CPRA regulations.		
Inferences drawn from any of the information identified above to create a profile about the Candidate	Assessment of characteristics, skills, abilities, and aptitudes		

## Disclosing your information to third parties

The chart below explains about the personal information we disclosed for a business purpose to third parties in the preceding 12 months.

Categories of personal information (under the CPRA)	Categories of third parties to whom we disclose your information and the specific business or commercial purpose for the disclosure
<b>Identifiers of the applicant</b>	<ul style="list-style-type: none"><li>• With other companies in our corporate group, for the same purposes indicated in the chart above.</li><li>• With outside legal counsels, for the purpose of handling complaints and lawsuits relating to your candidacy.</li><li>• With third parties to which a law or binding order requires us to disclose your information to. Our purpose in doing so complying with our obligations under the law or the binding order.</li><li>• With the target entity of our merger, acquisition or reorganization, and legal counsels, and advisors, for the purpose of facilitating the structural change in the operation of our business within a different framework, or through another legal structure or entity (such as due to a merger or acquisition).</li></ul>
<b>Other information that identifies, relates to, describes, or is capable of being associated with, the applicant</b>	
<b>Professional or employment-related information</b>	
<b>Education information</b>	
<b>Characteristics of protected classifications under California or federal law</b>	
<b>Inferences drawn from any of the information identified above to create a profile about the applicant</b>	

## Your rights under the CPRA if you are a resident of California

### Knowing the personal information, we collect about you

You have the right to know:

- The categories of personal information we have collected about you.
- The categories of sources from which the personal information is collected.
- Our business or commercial purpose for collecting personal information.
- The categories of third parties with whom we share personal information, if any.
- The specific pieces of personal information we have collected about you.



## **Right to deletion**

Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:

- Delete your personal information from our records; and
- Direct any service providers to delete your personal information from their records.

Please note that we may not delete your personal information if it is necessary to:

- Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us.
- Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act.
- Engage in public or peer-reviewed scientific, historical, or statistical research that conforms or adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the ability to complete such research, provided we have obtained your informed consent.
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us and compatible with the context in which you provided the information.

or

- Comply with an existing legal obligation.

We also will deny your request to delete if it proves impossible or involves disproportionate effort, or if another exception to the CPRA applies. We will provide you with a detailed explanation that includes enough facts to give you a meaningful understanding as to why we cannot comply with the request to delete your information.

## **Right to correct inaccurate personal information**

If we receive a verifiable request from you to correct your information and we determine the accuracy of the corrected information you provide, we will correct inaccurate personal information that we maintain about you.

In determining the accuracy of the personal information that is the subject of your request to correct, we will consider the totality of the circumstances relating to the contested personal information.

We also may require that you provide documentation if we believe it is necessary to rebut our own documentation that the personal information is accurate.

We may deny your request to correct in the following cases:

- We have a good-faith, reasonable, and documented belief that your request to correct is fraudulent or abusive.
- We determine that the contested personal information is more likely than not accurate based on the totality of the circumstances.
- Conflict with federal or state law.
- Other exception to the CPRA.
- Inadequacy in the required documentation
- Compliance proves impossible or involves disproportionate effort.

We will provide you a detailed explanation that includes enough facts to give you a meaningful understanding as to why we cannot comply with the request to correct your information.

### **Protection against discrimination**

You have the right to not be discriminated against by us because you exercised any of your rights under the CPRA.

### **Exercising your CPRA rights by yourself or through an authorized agent**

If you would like to exercise any of your CPRA rights as described in this Notice, please contact us by e-mail at [candidates@silk.us](mailto:candidates@silk.us)

We will ask you for additional information to confirm your identity and for security purposes, before disclosing the personal data requested to you, by using a two or three points of data verification process, depending on the type of information you require and the nature of your request.

You may also designate an authorized agent to make a request under the CPRA on your behalf. To do so, you need to provide the authorized agent written permission to do so and the agent will need to submit to us proof that they have been authorized by you. We will also require that you verify your own identity, as explained above.