

Taboola Employee Data Policy

Last Updated: 12 May 2022

Dear Taboolars (and potential Taboolars):

At Taboola, our employees are our top priority, and we are glad to have you as a member or potential member of our team! Every permanent and non-permanent employee, former employee, contractor, consultant, temporary worker, intern, job applicant, and volunteer ("Employee", "Taboolar", "you", or "your") has an important role in our operations and we value the abilities, experience, and background that each brings. We know that our Employees provide the services that our customers and partners rely upon and enable us to grow and create new opportunities for the years to come.

Taboola is made up of a family of global companies, including our parent company, Taboola.com Ltd. and its subsidiary and affiliate entities (collectively referred to herein as "Taboola", the "Taboola Corporate Group", "we", "us" or "our"). We consider all Taboolars to be members of the Taboola family and we are committed to maintaining the accuracy, confidentiality, and security of your Personal Data (defined below). Similarly, we are dedicated to providing you with the highest level of transparency and control over our use of your Personal Data.

Purpose of this Employee Data Policy

- To ensure that you understand your data rights as a Taboola Employee and how you can exercise them
- To provide you with internal points of contact, should you have any questions about our use of your Personal Data
- To address the agreements Taboola has with third-party processors of your Personal Data
- To explain the process of how you can access and update your Personal Data
- To provide you with guidance on how you should use and protect our customers' and partners' Personal Data

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Why do we need this?

Taboola is growing faster than ever — with a new Taboolar starting almost every week! To account for this incredible growth, we have prepared these policies to ensure that all Employees understand their data rights and the ways that Taboola may use their Personal Data. This policy also outlines your responsibility with respect to third party Personal Data you may have access to as part of your employment with Taboola. In addition, for Employees based in the European Economic Area (the “EEA”), this policy outlines the basis under which we process your Personal Data under the General Data Protection Regulation (the “GDPR”) and for Employees based in the People’s Republic of China (“PRC”), this policy outlines the basis under which we process your Personal Data under the Personal Information Protection Law (‘PIPL’).

What is “Personal Data”?

For purposes of this Employee Data Policy, Personal Data includes any information about an identifiable individual. However, when Personal Data is used or disclosed for Taboola’s business communications, Personal Data does not include (1) the individual’s business title, or (2) the individual’s business contact information. Personal Data also does not include anonymous or non-Personal Data (for example, information that cannot be associated with or tracked back to a specific individual). We will refer to your Personal Data herein as “Employee Data”.

What Employee Data Do We Collect?

We collect and maintain different types of Personal Data about our Employees. This includes the Personal Data contained in:

- Resumes and applications;
- References and interview notes;
- Letters of offer and acceptance of employment;
- Mandatory policy acknowledgements (such as pay wage notice acknowledgement forms);
- Wage and payroll information, including but not limited to social security and national insurance numbers and direct deposit information;
- Benefit information and any forms related to applications for, or changes to, Employee health and welfare benefits (including, short-term and long-term disability, medical and dental care);
- Beneficiary and emergency contact information;
- Access card entry and surveillance footage;
- Employee photographs and video footage (for example, in our human resources databases, from company events and security camera footage).

Personal data also includes information such as your name, home address, telephone number, personal email address, date of birth, Employee identification number, marital status, and any other information necessary for Taboola's business purposes, that the Employee or candidate voluntarily discloses during an application for and employment with Taboola.

What does Taboola do with your Employee Data?

Taboola uses and discloses your Employee Data for our internal business purposes, including to establish or manage your employment relationship with Taboola, or to offboard Employees. Such uses (outlined in further detail in our [Global Employee Privacy Notice](#), below) include:

- To determine eligibility for initial employment, including verifying references and qualifications;
- To administer pay and benefits;
- To process Employee work-related claims (for example, worker compensation and insurance claims)
- To establish training and development requirements;
- To conduct performance reviews and determine performance requirements;
- To assess qualifications for a particular job or task;
- To gather evidence for disciplinary action or termination;
- To identify a contact point in the event of an emergency;
- To comply with applicable labor or employment statutes;
- To ensure Employee safety and the security of company-held information; and
- For any other purposes that are reasonably required by Taboola in connection with application for and during the course of employment with Taboola.

We may also share your Employee Data with third parties that provide important services related to these purposes (such as benefits administrators, or pension plan, insurance or benefit and providers).

What are your responsibilities as a Taboola Employee for handling the Personal Data of third parties'?

During your employment with Taboola, you will regularly come into contact with Personal Data from our third party clients and partners. This will include our professional contacts' names, contact details, job titles, and other information that is necessary for our business operations. As a representative of Taboola, you are expected to help us ensure our responsible processing and handling of third party data. This includes using the Personal Data only as needed to provide Taboola's services to the particular client or partner and not sharing the Personal Data with any third party.

Taboola is required to immediately respond to any "Data Subject Access Requests" that we receive. So if you receive an inquiry from a customer, partner, or third party (i) asking what information or Personal Data Taboola holds about that individual, or (ii) requesting that we update or delete that individual's contact information or Personal Data, please acknowledge receipt letting the individual know that you are passing their request to our privacy team and direct this immediately to Taboola's Privacy Team, at privacy@taboola.com. Please remember that a data access request does not have to be official or mention data protection law to qualify as a valid request. If you are ever unsure, it is best to check with our Privacy Team.

Who can you speak to if you have any questions or concerns?

If you have any questions about how this policy applies to you, or how to exercise any of your rights, please reach out to your designated human resources representative.

Global Employee Privacy Notice

1. *Introduction*

- 1.1 Taboola respects the privacy rights of our permanent and non-permanent employees, former employees, contractors, consultants, temporary workers, interns, job applicants, and volunteers ("Employees", "you", "your"), and we are dedicated to providing transparency around the ways that we interact with your data. Taboola collects, uses, and discloses Personal Data as specified by the laws of the countries in which our Employees reside. This Global Employee Privacy Notice (the "Privacy Notice") applies to everyone who performs work for Taboola, anywhere around the globe.
- 1.2 This Privacy Notice outlines Taboola's standards for processing our Employees' Personal Data ("Employee Data"). This Privacy Notice sets forth Taboola's obligations to protect Employee Data, but it does not replace any specific data requirements that may apply to Taboola's corporate functions or business units, which are simultaneously in effect. If there is a discrepancy between these requirements, the most protective provision will apply.
- 1.3 If you have any questions or would like to discuss anything in this Privacy Notice, please do not hesitate to reach out according to the contact details in [Section 10 below](#).

2. *Employee Data We Collect*

- 2.1 In connection with your employment with Taboola or your application for employment with Taboola, we may collect the following types of Personal Data about you, your dependents, and other individuals that you inform us are connected to you:
 - (a) Identification data – such as your name, gender, photograph, date of birth, Employee identification number, and languages.
 - (b) Contact details – such as your home address, telephone number, email addresses, beneficiaries, and emergency contact details.
 - (c) Employment details – such as your job title, office location, hire date, employment contracts, performance and disciplinary records, grievance procedures, and sickness and holiday records.
 - (d) Educational and professional background – such as your academic and professional qualifications, education, CV or résumé, reference letters and interview notes, and criminal records data (only for vetting purposes, where permissible and in accordance with applicable law).
 - (e) National identifiers – such as your social security number, national ID or passport, immigration status and documentation, visas, and insurance numbers.

- (f) Spouse & dependent information – such as your marital status.
- (g) Financial information – such as banking details, tax information, payroll information, withholdings, salary, benefits, expenses, company allowances, and stock and equity grants.
- (h) IT information – information required to provide access to Taboola's IT systems and networks such as IP addresses, log files, login information, and software/hardware inventories. For further information about how we process IT information, see [Section 8 below](#).
- (i) Security information -- such as access card usage (to enter Taboola's offices) and closed-circuit televisions ("CCTV") footage.
- (j) Other information you choose to share with us – such as your hobbies and social preferences etc.

2.2 We may also collect certain demographic data that qualifies as sensitive Employee Data, such as race, ethnicity, sexual orientation, and disability to help us understand the diversity of our workforce, provide work-related accommodations, manage absences from work, or conduct background checks necessary for the Employee's role in advance of employment. This information, when collected, is generally done so on a voluntary, consensual basis, and Employee are not required to provide this information, unless it is necessary for us to collect such information to comply with our legal obligations.

2.3 Generally, we collect Employee Data directly from our Employees. However, in some cases, we may collect Personal Data about Employees from trusted third parties (for example, when we perform background checks that are necessary for the Employee's role or to obtain information from recruiters in connection with potential applicants). In most circumstances, we will obtain your permission before we collect any Personal Data about you from a third party.

2.4 If we ask you to provide any other Personal Data not described above, then we will make clear to you what specific Personal Data we need and the reasons why we ask you to provide it.

3. *How We Use Your Employee Data*

3.1 Taboola uses and discloses the Employee Data that we collect primarily for the purposes of managing our employment relationship with you, along with other business purposes, which may include:

- (a) Recruitment;
- (b) To understand whether we are meeting our diversity goals and how we can improve our practices going forwards;

- (c) To determine eligibility for hiring (including the verification of references and qualifications);
- (b) To administer payroll and benefits;
- (c) To administer background checks when necessary for the role, where permitted by law;
- (d) To process Employees' work-related claims (such as workers' compensation and insurance claims);
- (e) To establish training and development requirements;
- (f) To determine performance requirements and review work performance;
- (g) To manage, plan, and organize workflow;
- (h) To ensure health and safety in the workplace;
- (i) To assess qualifications for a particular job or task;
- (j) For disciplinary actions or terminations;
- (k) To establish emergency contacts;
- (l) To comply with laws and regulations (such as employment laws, health and safety laws, tax laws, and anti-discrimination laws), under judicial authorization, or to exercise or defend Taboola's legal rights;
- (m) To compile internal directories (such as Employee directories);
- (n) To detect fraud or other types of wrongdoing;
- (o) For IT security and administration;
- (p) For accounting, financial reporting, and business planning;
- (q) To monitor Taboola's premises and communication facilities, including closed-circuit televisions ("CCTV") cameras,
- (r) To organize team-building activities and other Taboola-hosted events;
- (s) For other legitimate purposes reasonably required for day-to-day operations.

3.2 We may also use your Employee Data for other lawful purposes that may arise. We will inform you of any such purpose, and will obtain your consent to that use, if required by law to do so.

4. *Legal Basis for Processing Your Employee Data*

- 4.1 If you are an Employee in the European Economic Area (the “EEA”) or the People’s Republic of China (“PRC”), our legal basis for collecting and using the Employee Data described above will depend on which data is concerned and the context in which we collect it. However, we will normally collect Employee Data from you only (i) where we have your consent to do so, (ii) where we need the Employee Data to carry out our employment contract with you, (iii) where we need the Employee Data to comply with our legal obligations or exercise rights in the field of employment, or (iv) where the processing of Employee Data is in our legitimate interests and does not override your data protection interests or your fundamental rights and freedoms. In some cases, we may need the Employee Data to protect your vital interests or those of another person (for example, we may need to share your Employee Data with third parties in the event of a work-related emergency).
- 4.2 If we ask you to provide Employee Data to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and let you know whether the provision of your Employee Data is mandatory (as well as the possible consequences if you do not provide it).
- 4.3 Similarly, if we collect and use your Personal Data in reliance on our legitimate interests (or those of a third party) that are not listed above, we will make clear to you at the relevant time what those legitimate interests are.
- 4.4 If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Data, please contact us using the contact details provided in [Section 10 below](#).

5. *How We Share Your Employee Data*

- 5.1 We take care to allow your Employee Data to be accessed only by those who truly must access it in order to perform a service for the Employee or for Taboola, and to third parties who have legitimate purpose for accessing it. Whenever we authorize third parties to access your Employee Data, we take steps to ensure they have appropriate security measures in place and that they only use the Employee Data in confidence and in a way that is consistent with this Privacy Notice.
- 5.2 We may share your Employee Data in the following ways:
- (a) With other companies in the Taboola Corporate Group: We may need to share your Employee Data with other Taboola offices around the world in order to manage and administer our human resources services, to manage Employee transfers and travel, and for other business purposes like IT, taxes, accounting, and general business management. These international companies in the Taboola Corporate

Group may be registered by a different legal name than the company with which you are employed — for example, you may be employed by Taboola Korea Ltd. and we may need to share your Employee Data with Taboola (Thailand) Limited — but these companies all operate together as one global Taboola entity.

- (b) With third party service providers and agents: We may also make certain Employee Data available to third parties who provide services to us (such as our human resource management software, Employee benefit plan providers, payroll support services, share incentive plan and Employee stock purchase plan coordinators, and Employee travel management services). When we share with these third parties, we do so on a need-to-know basis and under clear contractual terms and instructions for the processing of Employee Data.
- (c) With third party companies that provide software and tools to Taboola: We may also make certain Employee Data available to third party companies that provide tools relevant for our business operations (such as to assist with internal ticketing, product engineering, and design services). Should these companies require user log in details, those details will be limited to the employee's name and professional email, and in limited circumstances, may be used and sold by the third party for advertising purposes.
- (d) With other third parties: We may also share your information with other types of third parties, such as our legal representatives, industry groups or self-regulatory bodies, or event planners, on lawful grounds. For example:
 - With your consent;
 - To comply with our legal obligations (including to comply with laws, regulations, and contracts, to respond to court orders, administrative or judicial process, subpoenas and search warrants, or to meet national security and law enforcement requests);
 - To establish, exercise, or defend against potential, threatened, or actual litigation;
 - To protect the safety, property, or vital interests of a person;
 - To protect Taboola's rights or property;
 - To organize team-building activities and other Taboola-hosted events;
 - To protect Taboola, our other Employees, customers, or the public from harm or illegal activities;
 - To respond to an emergency that we, in good faith, believe requires us to disclose data to prevent harm; and

- In connection with the sale, assignment, merger, or other reorganisation or transfer of all or part of our business.

6. *International Transfers of Your Employee Data*

- 6.1 Taboola and our service providers may collect, use, process, store, or disclose your Employee Data outside your home country or jurisdiction. These outside countries may have different data protection laws than the laws of your home country. But rest assured that Taboola only transfers Employee Data to another country (including to a company within the Taboola Corporate Group) in accordance with applicable privacy laws, and where there are adequate data protections in place. We will ensure that your Employee Data is treated in accordance with this Privacy Notice wherever we process it.
- 6.2 If you are an Employee in the EEA or the PRC, Taboola may transfer your Employee Data outside of the country in which you work. To ensure that your Employee Data is adequately protected in such transfers, applicable data protection laws mandate that such transfers must take place using certain legal mechanisms. When transferring your Employee Data from the EEA to Israel, Taboola relies on the European Commission's determination that Israel offers adequate data protection for transfers from the EEA. When transferring Employee Data from the EEA or PRC to elsewhere, Taboola relies on the European Commission's approved Standard Contractual Clauses, which are contractual privacy and security commitments between companies that transfer Personal Data (for example, from Taboola Europe Limited to Taboola, Inc.). Taboola.com Ltd. and its Affiliates have accordingly adopted Standard Contractual Clauses to ensure the legality, privacy, and security of the data flows necessary to provide, maintain, and develop our services.

7. *How Long We Keep Your Employee Data*

- 7.1 We will keep your Employee Data for as long as is needed to carry out the purposes described above (or as otherwise required by law). Generally, this means we keep your Employee Data until the end of your Taboola employment, plus a reasonable period of time after to respond to any employment inquiries, deal with any legal or administrative matters, or to provide you with ongoing pensions and other benefits.

8. *Monitoring Notice*

- 8.1 We periodically need to monitor our IT and communications systems for specific purposes. We may do this through automated tools like anti-malware software, website filtering, spam filtering, intrusion detection and prevention systems, security software and mobile device management solutions to maintain and protect our IT systems and network security, including investigating and responding to suspected security incidents.
- 8.2 We also monitor Taboola's office premises by security footage and badge scans.

- 8.3 Where permitted by law, we may also monitor for other purposes, such as:
- (a) To document and archive proof of business transactions;
 - (b) To train and evaluate our Employees;
 - (c) To protect our confidential information, intellectual property, and other business interests;
 - (d) To investigate breaches of our company policies or other unlawful or improper acts;
 - (e) To comply with a legal obligation; and
 - (f) For other legitimate purposes, as permitted by applicable law.
- 8.4 Please note that any Employee telephone conversations or transmissions, message, files, data, document, electronic communications, social media posts, internet access or usage, or any other types of information transmitted to or from, received or printed from, or created, stored, or recorded on our IT and communications systems and assets (excluding Taboola-provided mobile phones, but including use of a computer, office telephone, wire, radio or electromagnetic, photoelectronic or photo-optical systems) are presumed to be Taboola business-related and we may monitor it at any and all times and by any lawful means in accordance with this Privacy Notice.
- 8.5 We recognise that any monitoring that we perform may impact our Employees' privacy, so we will always seek to ensure that any monitoring we perform is proportionate for the limited and specific purposes needed and conducted as required or permitted by applicable law. Before undertaking any monitoring activities, we will always consider your privacy carefully and assess whether there are any less invasive options available.

9. *Your Rights to Your Employee Data*

- 9.1 Several of our self-service HR Information Systems ("HRIS") (for example, Bamboo, SuccessFactors, and ADP) allow you to view and update some of the Employee Data that Taboola holds about you. If we have Employee Data that you cannot access via these HRIS tools, or if we have Employee Data that you believe is inaccurate or no longer relevant, and you would like us to correct or delete such data, then you may make a request via email to your designated human resources representative.
- 9.2 If you are located in certain regions (including the EEA, PRC, Brazil, and Thailand), you may have certain additional rights in relation to your Personal Data, such as:
- (a) You have the right to update, correct, and access your Personal Data.
 - (b) If we have collected and processed your Personal Data with your consent, then you have the right to withdraw your consent at any time. (Please note that

withdrawing your consent will not affect the lawfulness of any processing we carried out prior to your withdrawal, nor will it affect processing of your Personal Data carried out in reliance on other lawful grounds other than consent).

- (b) The right to object to processing of your Personal Data, ask us to restrict processing of your Personal Data, or request portability of your Personal Data.
- (b) To have your Personal Data erased in a number of other circumstances, such as where it has been unlawfully processed, or where there are no overriding legitimate grounds for the processing.

9.3 You can make any of these requests by using the contact details provided in [Section 10 below](#). We will respond to all requests in accordance with applicable data protection laws.

10. *Questions and Concerns*

10.1 If you have any questions or concerns about this Privacy Notice please contact Taboola's Privacy Team at privacy@taboola.com, or your designated human resources representative as listed below:

- (a) In Asia: Anjali Oldfield, anjali.o@taboola.com
- (b) In Israel: Efrat Israeli-Korn, efrat.i@taboola.com
- (c) In Europe: Anjali Oldfield, anjali.o@taboola.com
- (d) In the United States: Lana Saad, lane.s@taboola.com
- (e) In Brazil and Latin America: Natalie Coggins, natalie.c@taboola.com

10.2 If you are an Employee in the EEA or PRC, you may also request to access and review our records of your Employee Data by emailing employeesubjectaccessrequest@taboola.com. This shall provide notice to Taboola's Privacy Team, human resources department, and Taboola's appointed data protection officer (our "DPO"). You also have the right to reach out directly to our DPO by emailing DPO@taboola.com. Employees in the EEA also have the right to lodge any complaints or concerns with your local data protection authority (a "DPA"). You can find a list of all the European DPAs at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm. Employees in the PRC also have the right to complain to the relevant department performing duties of Personal Information protection (not yet identified).

11. *Updates to this Privacy Notice*

11.1 We may update this Privacy Notice from time to time to reflect any changes in our privacy practices. Where the changes are material, we will inform all Taboola Employees by email

and we will also indicate at the top of this Privacy Notice the date that it was last updated. We encourage you to check back periodically to make sure you're aware of the most recent provisions.

Internal Data Handling Policy

1. *Introduction*

- 1.1 Taboola has issued this Internal Data Handling Policy ("Data Handling Policy") for permanent and non-permanent employees, former employees, contractors, consultants, temporary workers, interns, and volunteers (each an "Employee", "you", or "your").
- 1.2 Taboola respects the Personal Data and data protection rights of all individuals (including our Employees, partners, clients, and potential clients), and we are fully committed and legally obligated to comply with applicable data protection laws. Because the Taboola Corporate Group is comprised of Taboola's many global offices and registered entities, and because Taboola engages in business across all corners of the globe, Taboola has determined that EU data protection laws, and specifically the General Data Protection Regulation 2016 (the "GDPR"), offers individuals the greatest data protections as it relates to handling of Personal Data. Thus, we determined that our global operations shall comply with these standards.
- 1.3 This Data Handling Policy explains what Taboola Employees must do when handling Personal Data found in Taboola's contracts, Personal Data about clients and professional contacts, and Personal Data provided by suppliers and colleagues. Please address any questions or comments about this Data Handling Policy to Taboola's Privacy Team, at privacy@taboola.com.

2. *Breaches of Data Protection Law and Breaches of This Internal Data Handling Policy*

- 2.1 Companies that suffer from a data protection breach can face (i) significant reputational harm; (ii) enormous fines; and (iii) claims from individuals for the breach of their data protection.
- 2.2 All Employees are expected to comply with this policy. Employee breaches of this Data Handling Policy will be taken seriously and may result in disciplinary action.

3. *Terminology Used in this Data Handling Policy*

- 3.1 "Personal Data" means any information about an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number, location data, online identifier, or to one or more factors specific to that person's physical, physiological, genetic, mental, economic, cultural or social identity.
 - (a) Examples of data that may permit this kind of identification in the employment context:

- (i) Identification data (such as name, address, date and place of birth, photograph);
 - (ii) Contact details (such as telephone number, email, address);
 - (iii) National identifiers (such as ID numbers, tax IDs/social security numbers, driver's licence number, passport number);
 - (iv) Information about education and training (educational history, professional qualification and experience, professional organisations, publications); and
 - (v) Information about professional status (such as title, position, location).
- (b) **Examples of data that may permit this kind of identification of a client or partner:**
- (i) Name and contact details on our Customer Relationship Management ("CRM") databases (including Salesforce, Taboola Ads, and our emailing platforms);
 - (ii) Email addresses;
 - (iii) IP addresses;
 - (iv) Newsletter subscriptions; and
 - (v) Marketing preferences.

3.2 "Data Subject" means individuals within the European Economic Area ("EEA") whose data is processed by Taboola. Data Subjects include: (i) individuals who interact with Taboola's Content Distribution Platform ("Users"); (ii) publishers, advertisers, and other content providers with whom Taboola has a contractual relationship, ("Customers"); and (iii) Taboola's permanent and non-permanent employees, former employees, contractors, consultants, temporary workers, interns, job applicants, and volunteers ("Employees").

3.3 "Processing", "Process" or "Processed" means any operation or set of operations performed upon Personal Data, whether or not by automatic means.

- (a) Examples of data processing include:
- (i) Collecting data;
 - (ii) Recording data;
 - (iii) Organising data;
 - (iv) Storing data,
 - (v) Altering data;
 - (vi) Retrieving data;
 - (vii) Consulting data,
 - (viii) Use of data;
 - (ix) Disclosure by transmission of data;

- (x) Transfer of data;
- (xi) Remote access to data;
- (xii) Alignment or combination;
- (xiii) Blocking data;
- (xiv) Erasing data; and
- (xv) Deleting data.

- 3.4 "Sensitive Data" is a subset of Personal Data that contains information relating to a person's race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data (for identifying a person), health data, and data about sex life or sexual orientation.
- 3.5 "Criminal Records Data" means information relating to criminal convictions and offenses or related security measures.

4. *Overarching Data Protection Principles*

- 4.1 As an organisation, Taboola we must ensure that we:
- (a) Are legally entitled to process the Personal Data under data protection law ("Lawful Grounds");
 - (b) Are transparent with individuals about what Personal Data we process and why ("Transparency");
 - (c) Do not use Personal Data for any purpose other than for which it is collected ("Purpose Limitation");
 - (d) Collect the minimum Personal Data needed for the purpose it is collected ("Minimisation");
 - (e) Keep Personal Data accurate and up to date ("Accuracy");
 - (f) Respect and honor the data subject rights of individuals based in specific regions (see the [EEA Data Subject Rights Handling Policy](#) and the [PRC Data Subject Rights Handling Policy](#) for more information) ("Data Subject Rights");
 - (g) Keep Personal Data secure when used both internally and when shared with third parties ("Security");
 - (h) Transfer (or allow the transfer of) Data Subject's Personal Data only if we have put in place appropriate data transfer arrangements ("Data Transfers"); and
 - (i) Build data protection compliance (for example, compliance with the above principles) into any new project that involves Personal Data processing or new use of Personal Data ("Data Protection by Design").

5. *How Should You as a Taboola Employee Comply with Data Protection Principles in Everyday Practice?*

- 5.1 Use your Taboola email account for all business correspondence — do not use your personal email account.
- 5.2 Scale down the Personal Data you access to only what is necessary to perform your required tasks.
- 5.3 Just because *you* can access certain Personal Data does not mean *everyone else* should. Before you share Personal Data with another Employee, be sure they *need* it and have the *right* to access and use it.
- 5.4 Change your passwords regularly. Do not write them down.
- 5.5 Be respectful of our Customer's contact choices -- if a contact is marked as "DO NOT CONTACT" in Salesforce, please do not contact them.
- 5.6 Encrypt Sensitive Data when necessary — for example, when saving to a flash drive or emailing it.
- 5.7 Use secure Internet connections when accessing our organisation's network.
- 5.8 Lock your computer when you step away from it.
- 5.9 Report suspicious-looking emails. Do not reply to them or open any links or attachments.
- 5.10 You should not collect or use any Sensitive Data or Criminal Records Data unless this has been reviewed and approved by Taboola's Privacy Team, at privacy@taboola.com.
- 5.11 Be aware of our policies and reach out to privacy@taboola.com with any questions.
- 5.12 Understand the different measures we have in place to protect Personal Data and know when to use them.
- 5.13 If you spot a privacy issue, report it to privacy@taboola.com or IT@taboola.com.

6. *How Does Taboola Comply with Data Protection Principles in Everyday Practice?*

We Ensure that We Have Lawful Grounds to Process Personal Data

- 6.1 We only process Personal Data for purposes permitted under applicable data protection law. Permissible purposes include:
 - (a) To comply with a legal obligation (for example, as an employer, we may be required to process certain information about our Employees);
 - (b) To protect the Data Subject's vital interests (for example, if there is a medical emergency);
 - (c) For performance of a contract with the Data Subject or to perform steps prior to entering into a contract at the request of the data subject;

- (d) For the legitimate interests of Taboola or a third party but only if the Data Subject's rights are not outweighed, for example, where the business benefit to Taboola is limited but there would be significant intrusion on the privacy of the Data Subject; and/or
 - (e) The Data Subject has given his or her consent (although this should only be sought if one or more of the other grounds above do not apply).
- 6.2 There are additional special grounds for processing Sensitive Data and data regarding criminal records. As noted above, you should not collect or use any Sensitive Data or Criminal Records Data unless it has been reviewed and approved by Taboola's Privacy Team, at privacy@taboola.com.

Relying on Consent

- 6.3 Whenever relying on consent to process Personal Data, Taboola ensures that consent is:
- (a) **Documented** – so we can demonstrate that we have obtained consent lawfully;
 - (b) **Given affirmatively (such as ticking a box or signing a document)** – we cannot rely on 'inaction' as a way of obtaining consent (e.g., no pre-ticked boxes);
 - (c) **Freely given and retractable at any time** – it must be as easy for Data Subjects to withdraw their consent as it is to give their consent; and
 - (d) **Not conditioned** – for example, not given on the condition that other actions are taken, accepted, or exchanged.

Transparency, Purpose Limitation and Minimisation

- 6.4 You, as a Taboola Employee, should decide what Personal Data is necessary for the intended purpose (i.e. to provide the required business services) and collect only the minimal Personal Data necessary for that purpose.
- 6.5 Because Personal Data may only be collected for a specific purpose, the Personal Data should only be retained for the time necessary to complete the purpose. Our Privacy Notices (internal and external) set forth the time period for which we generally retain Personal Data. Our computer and IT systems are already structured to comply with these timeframes, so you should not tamper with these settings to keep the Personal Data for any longer.
- 6.6 If you need to use Personal Data that Taboola has provided you access to for any purpose other than legitimate business purposes, this must be reviewed and approved by Taboola's Privacy Team, at privacy@taboola.com.

Accuracy

- 6.7 We must keep Personal Data accurate. This will mean, in each relevant context, that we must consider how we will regularly update information. If you get any such request from a

client or partner, please direct this request to Taboola's Privacy Team, at privacy@taboola.com.

Data Subject Rights (EEA and PRC Only)

- 6.8 Data Subjects in the EEA and PRC are entitled to exercise certain rights with respect to their own Personal Data. These rights are explained in [Taboola's EEA Data Subject Rights Handling Policy](#) and [Taboola's PRC Data Subject Rights Handling Policy](#).
- 6.9 If a Data Subject's Personal Data is shared with a third party or if a third party shares Personal Data directly with Taboola, we are required to ensure that a mechanism is in place to communicate with each other about any requests to restrict, delete, or correct Personal Data, unless this would be impossible or involve disproportionate effort. If you receive an inquiry from a Data Subject, such as a User or Customer or any other third party (i) asking what information or Personal Data Taboola holds about that individual, or (ii) requesting that we update or delete that individual's information or Personal Data, please direct it immediately to Taboola's Privacy Team, at privacy@taboola.com.

Security

- 6.10 Taboola must keep Personal Data secure and protect it from any unauthorised access, accidental loss, damage, or destruction. You should ensure that you are familiar with, and that you follow, our security policies and procedures that are designed to protect our IT systems, our premises, and the data stored within them (including both confidential information and Personal Data). You must also follow the practical steps set forth [above in Section 5](#).
- 6.11 When Taboola collects Personal Data for a particular purpose, we must always consider whether we could achieve the same purpose with anonymised data. If that is not possible, we should strive to encrypt or pseudonymize the Personal Data (for example, by masking, hashing, or otherwise concealing the data). The more confidential the information, the higher our security standards will need to be to protect it. Please consult with Taboola's Privacy Team, at privacy@taboola.com, if you have questions about whether certain Personal Data needs to be encrypted or pseudonymised.
- 6.12 Personal Data should not be shared with anyone or any organisation outside of the Taboola Corporate Group (including to our service providers) unless (i) appropriate contractual arrangements have been signed (including our standard non-disclosure and data processing agreement), or (ii) the disclosure is otherwise permitted under data protection law. Please consult with Taboola's Legal team (legal@taboola.com) prior to sharing any Personal Data with any third party.
- 6.13 Before authorizing any third party providers to hold or have access to Personal Data on our behalf, Taboola must first carry out due diligence to verify that the third party meets our data protection standards for Personal Data and is compliant with the GDPR's requirements. Please refer requests for due diligence assistance to Taboola's IT Team, at IT@taboola.com.

Data Transfers

- 6.14 Personal Data cannot be transferred outside of the EEA, unless the transfer is:
- (a) To a country approved by the European Commission as having adequate data protection laws to protect the Personal Data (there are only a handful of these);
 - (b) To an organisation that has entered into a data transfer agreement with us (based on European Commission approved standard contracts); or
 - (c) To an organisation that has its "binding corporate rules" approved by the European data protection regulators.
- 6.15 Personal Data cannot be transferred outside of the PRC, unless the transfer:
- (a) Is with the Employee's consent to do so;
 - (b) Passed the security assessment organized by the PRC cyberspace administration;
 - (c) Has been certified in accordance with the provisions of the PRC cyberspace administration;
 - (d) Is to an overseas recipient that has entered into a data transfer agreement (based on a standard contract formulated by the PRC cyberspace administration, or until available, is in good faith based on best industry practices);
 - (e) Satisfied other conditions prescribed by laws, administrative regulations, or the PRC cyberspace administration.
- 6.16 If you are aware of any (planned) Personal Data transfers without at least one of the above mechanisms in place or to confirm that one of the above mechanisms is in place, please contact Taboola's Legal Team, at legal@taboola.com.

Data Protection by Design and Data Protection Impact Assessments

- 6.17 Taboola must build data protection compliance into our processes and systems from the ground up. To do this, it is important that all Employees have a good understanding of our data protection obligations (as set out in this Data Handling Policy). It is also necessary to ensure that the concept of "Data Protection by Design" — or ensuring that new systems that Taboola introduces are designed to minimize the Personal Data that they collect — is embedded into our product development processes and considered from the outset and throughout the life cycle of the product. This is especially important for our R&D, Product, and IT Employees to keep in mind as they perform their business tasks.
- 6.18 We also have standard procedures and templates for carrying out a "Data Protection Impact Assessment" or "DPIA" — which is the process of evaluating and documenting the potential individual privacy risks that could result from Taboola's new projects, processes, or product developments that involve the collection of Personal Data. For higher risk (more intrusive) uses of Personal Data, completing a DPIA may be required by data protection law. Please consult with Taboola's Privacy Team, at privacy@taboola.com to determine whether your new project or product development task requires a DPIA.

7. *Data protection complaints*

- 7.1 For instructions on how EEA Data Subjects may exercise their data subject rights, please see the [EEA Data Subject Rights Handling Policy](#). For instructions on how PRC Data Subjects may exercise their data subject rights, please see the [PRC Data Subject Rights Handling Policy](#).
- 7.2 For complaints from individuals about Taboola's processing of their Personal Data, please immediately direct the complaint to Taboola's Privacy Team, at privacy@taboola.com.

EEA Data Subject Rights Handling Policy

1. *Introduction*

Taboola has issued this EEA Data Subject Rights Handling Policy to describe the practices and procedures that Taboola follows when it receives requests about our use of Personal Data from: (i) individuals who interact with Taboola's Content Distribution Platform ("Users"); (ii) publishers, advertisers, and other content providers with whom Taboola has a contractual relationship, ("Customers"); and (iii) Taboola's permanent and non-permanent employees, former employees, contractors, consultants, temporary workers, interns, job applicants, and volunteers ("Employees"). Any individual User, Customer, or Employee in the European Economic Area, ("EEA") whose data is processed by Taboola shall each be referred to hereinafter as a "Data Subject".

2. *Rights That All Data Subjects Have Regarding Their Personal Data*

Data Subjects have data protection rights that they may exercise by making a request to Taboola (a "Data Subject Rights Request"). These data subject rights include the right to request:

- Access to their Personal Data;
- Rectification or Correction of their Personal Data;
- Erasure of their Personal Data (also referred to as the '*Right to be Forgotten*');
- Restriction on Taboola's processing of their Personal Data;
- Portability of their Personal Data;
- Termination of any further processing of their Personal Data (also referred to as the '*Right to Object*');
- Not to be subject to automated decision making; and
- Not to be sent direct marketing.

2.1 Each of these rights is described in more detail in [Sections 11-18 below](#).

2.2 The procedures described in this EEA Data Subject Rights Handling Policy outline how Taboola, as a data controller (the entity determining the purpose for which, and manner in which, the Personal Data is processed), will respond to any Data Subject Rights Requests.

3. *Responsibility to Respond to a Data Subject Rights Request*

3.1 The controller of a Data Subject's Personal Data is primarily responsible for responding to a Data Subject Rights Request and for facilitating the Data Subject's exercise of his or her rights under applicable data protection laws. For example, because Taboola determines

what data it will collect from its Employees, and how it will process this Employee data, Taboola is the controller of the Employee's Personal Data that it holds and processes. As the controller of the Employee's Data, Taboola must respond to any Data Subject Rights Request we receive from an Employee. As a second example, Taboola is a controller of the data that we collect from individuals ("Users") who interact with the Taboola Content Discovery Platform because we determine the purposes for which the data is collected and the means by which it is processed. Therefore, Taboola must respond to any Data Subject Rights Request we receive from a User about the Personal Data that we collect through our Content Discovery Platform.

- 3.2 In certain circumstances, Taboola may process a Data Subject's Personal Data as a processor on behalf of a third party who is the controller (rather than for its own purposes). In such instances, Taboola must inform the relevant third party promptly and provide it with reasonable assistance to help the third party honor the Data Subject's rights in accordance with applicable data protection laws.

4. Personal Data That Taboola Has Made Available to Third Parties

- 4.1 If Taboola shares Personal Data with third parties, it is our responsibility to inform those third parties of any request we receive from Data Subjects to rectify, erase, or restrict their Personal Data, unless doing so would involve disproportionate effort or is impossible. For example, when Taboola receives a Data Subject Rights Request, we must notify any relevant Taboola entity, processors, or other third parties (such as occupational health providers) that we have disclosed the Personal Data to, so that they may also update their records accordingly. As a general rule, in order to comply with this requirement, Taboola requires that all of its processors erase any Personal Data they receive from Taboola within thirty (30) days of their receipt of such Personal Data. If you have concerns about any service providers that you are engaged with, please consult with Taboola's Legal Team, at legal@taboola.com.
- 4.2 If requested, Taboola must also provide the Data Subject with details about third parties to whom we have disclosed the Data Subject's Personal Data.

5. Where Can You Send Your Own Data Subject Rights Requests and Questions?

- 5.1 If you are an Employee in the EEA, and you wish to make a Data Subject Rights Request regarding the Personal Data that Taboola holds about you, please send your request to employeesubjectaccessrequest@taboola.com.
- 5.2 Any questions regarding Employee Data Subject Rights Requests should also be sent to employeesubjectaccessrequest@taboola.com.

5.3 Users who engage with the Taboola Content Discovery Platform can make a Data Subject Rights Request [here](#). All Data Subject Rights Requests and questions that you receive from non-Employees should be sent to Taboola's Privacy Team at privacy@taboola.com.

6. *What to Do if You Receive a Data Subject Rights Request from an Employee or a Non-Employee Data Subject*

6.1 If you receive a Data Subject Rights Request from another Taboola Employee, you should immediately direct the request to employeesubjectaccessrequest@taboola.com. Please also include the date on which you received it, along with any other information that may help us efficiently respond to the request.

6.2 If you receive a Data Subject Rights Request from a User who interacts with the Taboola Content Discovery Platform, you should (1) immediately refer the Data Subject to Taboola's Data Subject Access Request Portal, available [here](#) and (2) immediately forward the request to Taboola's Privacy Team, at privacy@taboola.com, and please also include the date on which you received it, along with any other information that may help us efficiently respond to the request.

6.3 If you receive a Data Subject Rights Request from a Customer, you should immediately direct the request to Taboola's Privacy Team, at privacy@taboola.com. Please also include the date on which you received it, along with any other information that may help us efficiently respond to the request.

6.4 European data protection legislation demands that Taboola respond to requests within a very short time frame, so it is crucial that you immediately direct any Data Rights Requests you receive to the appropriate person indicated above without delay.

7. *Verification Process*

7.1 Taboola's Privacy Team will assess every Data Rights Request that we receive to determine whether Taboola is the controller or a processor of the data requested. We may also need to verify that the request has been made by a genuine Data Subject (which may require that we request further identification of the requestor).

7.2 If we determine that Taboola is a processor of the Data Subject's requested data, and that one of Taboola's Customers or another third party is the controller of this data, then Taboola shall notify the Customer or third party as soon as possible, per data protection regulations. Taboola shall also help the controller comply with the Data Subject Rights Request (in accordance with any contract terms which may be in place with the controller).

7.3 If we determine that Taboola is the controller of the Data Subject's requested data, Taboola shall contact the individual in writing to confirm receipt of the Data Subject Rights Request and seek confirmation of identity (if not already validated).

7.4 If Taboola is not exempt under applicable data protection laws from fulfilling the Data Subject Rights Request (see [Section 9.1, below](#)), then Taboola, to the extent it deems necessary, will request any further information needed to action the individual's request. Once Taboola has all the information it needs to honor the Data Subject Rights Request, Taboola will respond to the request in accordance with [Section 11, below](#).

8. *Exemptions from Requirement to Respond to a Data Subject Rights Request*

8.1 Taboola is permitted to decline to honor a Data Subject Rights Request that is excessive or manifestly unfounded (for example, because repetitive requests have been made). In this case, Taboola must be able to demonstrate that the request is in fact, excessive or manifestly unfounded.

8.2 In some cases, specific additional exemptions may apply. Where specific exemptions relating to particular Data Subject Rights Request exist, these are explained below.

8.3 If Taboola is exempt from the requirement to fulfill a received Data Subject Rights Request, then Taboola will notify the individual that we intend to decline the Data Subject Rights Request and explain why an exemption applies. Employees should always forward inquiries to Taboola's Privacy Team, at privacy@taboola.com, who can make an assessment about whether such an exemption applies. Please never make this determination yourself.

9. *Timeframe for Responding to a Data Subject Rights Request*

9.1 Data Subject Rights Requests must be responded to without undue delay and in no case later than one month from the receipt of the request, unless this is not possible because the request is particularly complex. In such complex cases, Taboola will be entitled to extend its response period by up to two additional months. Within the initial month following receipt of the Data Subject Rights Request, Taboola must provide the Data Subject with notice of its intention to respond within this extended time period. The notice provided must explain the reasons for the delay. Given this short time frame for responding to Data Subject Rights Requests, it is imperative that you direct any requests that you receive immediately to Taboola Privacy Team, at privacy@taboola.com.

10. *Charging for Data Subject Rights Requests*

10.1 Taboola is not legally permitted to charge for acting on a Data Subject Rights Request unless Taboola is exempt from the obligation to act on the request (see [Section 8, above](#)) but is nonetheless prepared to act on the request anyway. In such a case, Taboola may charge the Data Subject a reasonable fee that accounts for the administrative costs of providing the information or communication or taking the action requested. Please consult

with Taboola's Privacy Team before seeking to impose any fees for responding to a Data Subject Rights Request.

11. *Requests for Access to Personal Data*

The Right of Access: This is a Data Subject's right to obtain confirmation about whether his or her data is processed by a controller, and, if so, to be provided with details about and access to that Personal Data.

Information to be Provided in Response to a Right of Access Request

- 11.1 A Data Subject is entitled to request a copy of his or her Personal Data from Taboola. Where a Data Subject makes such a request, Taboola must confirm whether it holds and is processing Personal Data about that Data Subject and, if so, Taboola must provide that Personal Data to the Data Subject in an intelligible form.
- 11.2 The Data Subject making the request should also be provided with the following information:
 - 11.2.1 A description of the Personal Data and categories of Personal Data concerned;
 - 11.2.2 The expected period for which the Personal Data will be stored;
 - 11.2.3 The purposes for which the Personal Data is being held and processed;
 - 11.2.4 The recipients or classes of recipients to whom the Personal Data is, or may be, disclosed by Taboola;
 - 11.2.5 Confirmation of the Data Subject's right to request rectification or erasure of his or her Personal Data or to restrict or object to its processing;
 - 11.2.6 Confirmation of the Data Subject's right to lodge a complaint with a competent data protection authority;
 - 11.2.7 Details about the source of the Personal Data, if it was not collected from the Data Subject;
 - 11.2.8 Details about whether the Data Subject's Personal Data is subject to automated decision-making (including profiling); and
 - 11.2.9 Where Personal Data is transferred from the European Economic Area to a country outside of the European Economic Area, the appropriate safeguards that Taboola has put in place relating to transfers in accordance with European data protection laws.

Format of Requests

- 11.3 An access request does not have to be official or mention data protection law to qualify as a valid request. Please keep this in mind to the extent you receive any type of request from

a User or Client — if you are not sure, it is best to check with Taboola's Privacy Team, at privacy@taboola.com.

- 11.4 An access request does not need to be made in writing and can be made orally but it is helpful if it is made in writing (for record keeping purposes). If made in writing it is also helpful if the Data Subject provides their email address and confirms whether the information can be sent to them by email (or other means by which they prefer to receive the information). Requests made electronically (e.g., by email) must be responded to electronically (in a commonly used format) unless the Data Subject stipulates otherwise. Data Subjects may ask for information to be provided orally instead. This is especially important for our human resources Employees to keep in mind, since they are most likely to receive oral requests from other Employees.

Exemptions

- 11.5 Taboola is not permitted to refuse to comply with an access request unless it can demonstrate that it is not in the position where we can identify the Data Subject who is making the request or Taboola is exempt from its obligations to comply (see [Section 8, above](#), regarding exemptions).

12. Requests to Rectify Personal Data

The Right to Rectification: This is a Data Subject's right to obtain rectification of inaccurate Personal Data that a controller may process about him or her.

Rectification by Taboola

- 12.1 If Taboola holds inaccurate or incomplete records of Personal Data about a Data Subject, the Data Subject is entitled to request that the Personal Data is rectified.

Rectification by Third Parties

- 12.2 If Taboola rectifies a Data Subject's Personal Data, Taboola must also convey this rectification to any third parties that also use this Personal Data for processing purposes. See [Section 4, above](#).

Supplementary Statements to Complete Personal Data

- 12.3 Because a request to rectify Personal Data involves ensuring that the records are complete, the Data Subject may elect to provide a supplementary statement so that Taboola may complete the records of Personal Data held about them. This process is unlikely to happen in connection with Taboola's Users, because we only hold their pseudonymized data. However, this may occur in connection with the Personal Data that we hold about our Customers or Employees.

13. *Requests to Erase Personal Data ("Right to be Forgotten")*

The Right to Erasure: This is a Data Subject's right to require a controller to erase his or her Personal Data on certain grounds – for example, where the Personal Data is no longer necessary to fulfil the purposes for which it was collected.

Circumstances in Which Right to Erasure Applies

- 13.1 A Data Subject may request that Taboola erases his or her Personal Data in the following circumstances:
- 13.1.1 The Personal Data is no longer necessary for the purpose for which it was collected or otherwise processed;
 - 13.1.2 The Personal Data was unlawfully processed by Taboola;
 - 13.1.3 If the processing was on the basis of the Data Subject's given consent, and the Data Subject elects to withdraw his or her consent (and Taboola does not rely on any other legitimate interest grounds for our processing);
 - 13.1.4 The Data Subject objects to Taboola's processing of his or her Personal Data (see [Section 14, below](#)) and Taboola does not have any overriding legitimate interest grounds for continuing to process the information; and
 - 13.1.5 The Personal Data needs to be erased to comply with Taboola's legal obligations.
 - 13.1.6 Taboola's Users may access and delete their Personal Data through Taboola's Data Subject Access Request Portal, available [here](#).
 - 13.1.7 Taboola's Customers may send an access or deletion request directly to our Employees. If you receive such a request from a Customer, please immediately direct it to Taboola's Privacy Team, at privacy@taboola.com.
 - 13.1.8 Taboola's EEA Employees should reach out to employee datasubjectrights@taboola.com to make any such requests.

Erasure of Personal Data by Processors

- 13.2 If Taboola erases a Data Subject's information further to such a request, Taboola must also notify its processors. See [Section 4, above](#).
- 13.3 If Taboola has made the Data Subject's Personal Data public (for example, by publicly posting a photograph of an Employee or Customer from an event), and if Taboola is obliged to erase the Personal Data pursuant to a Data Subject Rights Request, Taboola must take reasonable steps, including technical measures (balancing its available technology and the cost of implementation), to inform processors that are processing the Personal Data that the Data Subject has requested that this Personal Data, and any links to, copies, or replicas, of the Personal Data be erased. This is most relevant for Taboola's Employees in our Marketing Departments, so please consult with Taboola's Privacy Team, at

privacy@taboola.com, if you receive any erasure requests from Customers or potential customers following any marketing events.

Exemptions

- 13.4 In addition to the exemptions referred to above, Taboola is exempt from the obligation to erase Personal Data where its processing is necessary for:
- 13.4.1 Compliance with Taboola's legal obligations;
 - 13.4.2 Establishing, exercising, or defending legal claims;
 - 13.4.3 Scientific, historical, or statistical purposes where erasure of the Personal Data would make this processing impossible or seriously impair it (please note that this exemption is unlikely to apply to Taboola).

14. Right to Object to Processing

The Right to Object: This is a Data Subject's right to object to a controller's processing of his or her Personal Data, if the controller is processing based on legitimate interest grounds.

Circumstances in Which Data Subjects May Object to Processing

- 14.1 A Data Subject may object to Taboola's processing of his or her Personal Data, where Taboola relies on its legitimate business interests as the grounds for processing the Personal Data.

Exemptions

- 14.2 In addition to the exemption referred to above, Taboola is exempt from the obligation to cease further processing of a Data Subject's Personal Data if:
- 14.2.1 Taboola can demonstrate that we have compelling legitimate interest grounds for processing the Personal Data that override the interests, rights, and freedoms of the Data Subject;
 - 14.2.2 The processing is to establish, exercise, or defend a legal claim; and
 - 14.2.3 The processing is for scientific, historical, or statistical purposes carried out in the public interest (please note that this exemption is unlikely to apply to Taboola).

15. *Right to Restriction*

The Right to Restriction: This is a Data Subject's right to require that Taboola restrict its processing of his or her Personal Data.

- 15.1 Where certain grounds are met (for example, where a Data Subject has contested the accuracy of data and a period of time is required for Taboola to verify the accuracy of the Personal Data or if Taboola is determining whether a Data Subject's objection to processing overrides Taboola's legitimate interests), the processing of the Data Subject's Personal Data will need to cease, absent the Data Subject's specific consent. If you believe you have received a request for restriction, please share it immediately with the Taboola Privacy Team, at privacy@taboola.com.

16. *Right to Data Portability*

The Right to Data Portability: This is Data Subject's right to request that a controller provide any Personal Data that it processed with the Data Subject's consent via automated means to another controller in a structured, commonly used, and machine-readable format.

- 16.1 For Taboola, this is likely to only apply when an Employee leaves Taboola to another employer. In such cases, Taboola shall take confidentiality into consideration before making any such transfer.

17. *Right to Not Be Subject to Automated Decision Making (Including Profiling)*

The Right to Not Be Subject to Automated Decision Making: This is the Data Subject's right to object to an automated decision made about an individual (for example, without a human involved) which has a legal or other similar effect on the individual. Individuals can ask for human intervention in the process.

- 17.1 Taboola does not engage in this type of automated decision making.

18. *Right to Object to Direct Marketing*

The Right to Object to Direct Marketing: This is a Data Subject's right to object to direct marketing, including profiling relating to direct marketing.

- 18.1 If Taboola receives a request to stop using Personal Data for direct marketing purposes, we must stop doing so. Please refer our Customers to [Taboola's Subscription Center](#) if you receive any such request and refer the request to Taboola's Marketing Team at marketing@taboola.com.

PRC Data Subject Rights Handling Policy

1. *Introduction*

Taboola has issued this PRC Data Subject Rights Handling Policy to describe the practices and procedures that Taboola follows when it receives requests about our use of Personal Data (in this PRC Policy, referred to as “**Personal Information**”) from: (i) individuals who interact with Taboola’s Content Distribution Platform (“**Users**”); (ii) publishers, advertisers, and other content providers with whom Taboola has a contractual relationship, (“**Customers**”); and (iii) Taboola’s permanent and non-permanent employees, former employees, contractors, consultants, temporary workers, interns, job applicants, and volunteers (“**Employees**”). Any individual User, Customer, or Employee in the People’s Republic of China, (“**PRC**”) whose data is processed by Taboola shall each be referred to hereinafter as a “**Data Subject**”.

2. *Rights That All Data Subjects Have Regarding Their Personal Information*

Data Subjects have data protection rights that they may exercise by making a request to Taboola (a “**Data Subject Rights Request**”). These data subject rights include the:

- Right to be informed
- Right to determine, restrict, and refuse data handling
- Right to access and request a copy
- Right to rectify and supplement
- Right to delete
- Right of portability
- Right relating to automated decisions
- Right of the deceased

2.1 Each of these rights is described in more detail in [Sections 11-18 below](#).

2.2 The procedures described in this PRC Data Subject Rights Handling Policy outline how Taboola, as a processing entity (the entity determining the purpose for which, and manner in which, the Personal Information is processed), will respond to any Data Subject Rights Requests.

3. Responsibility to Respond to a Data Subject Rights Request

- 3.1 The personal information processing entity of a Data Subject's Personal Information is primarily responsible for responding to a Data Subject Rights Request and for facilitating the Data Subject's exercise of his or her rights under applicable data protection laws. For example, because Taboola determines what data it will collect from its Employees, and how it will process this Employee data, Taboola is the processing entity of the Employee's Personal Information that it holds and processes. As the processing entity of the Employee's Data, Taboola must respond to any Data Subject Rights Request we receive from an Employee.
- 3.2 In certain circumstances, Taboola may process a Data Subject's Personal Information as an entrusted party on behalf of a third party who is the processing entity (rather than for its own purposes). In such instances, Taboola must inform the relevant third party promptly and provide it with reasonable assistance to help the third party honor the Data Subject's rights in accordance with applicable data protection laws.

4. Personal Information That Taboola Has Made Available to Third Parties

- 4.1 If Taboola shares Personal Information with third parties, it is our responsibility to inform those third parties of any request we receive from Data Subjects to rectify, erase, or restrict their Personal Information, unless doing so would involve disproportionate effort or is impossible. For example, when Taboola receives a Data Subject Rights Request, we must notify any relevant Taboola entity, processors, or other third parties (such as occupational health providers) that we have disclosed the Personal Information to, so that they may also update their records accordingly. As a general rule, in order to comply with this requirement, Taboola requires that all of its entrusted parties erase any Personal Information they receive from Taboola within thirty (30) days of their receipt of such Personal Information. If you have concerns about any service providers that you are engaged with, please consult with Taboola's Legal Team, at legal@taboola.com.
- 4.2 If requested, Taboola must also provide the Data Subject with details about third parties to whom we have disclosed the Data Subject's Personal Information.

5. Where Can You Send Your Own Data Subject Rights Requests and Questions?

- 5.1 If you are an Employee in the PRC, and you wish to make a Data Subject Rights Request regarding the Personal Information that Taboola holds about you, please send your request to employeesubjectaccessrequest@taboola.com.
- 5.2 Any questions regarding Employee Data Subject Rights Requests should also be sent to employeesubjectaccessrequest@taboola.com.

- 5.3 Users who engage with the Taboola Content Discovery Platform can make a Data Subject Rights Request via [Taboola's Global Data Subject Access Request Portal](#). All Data Subject Rights Requests and questions that you receive from non-Employees should be sent to Taboola's Privacy Team at privacy@taboola.com.

6. *What to Do if You Receive a Data Subject Rights Request from an Employee or a Non-Employee Data Subject*

- 6.1 If you receive a Data Subject Rights Request from another Taboola Employee, you should immediately direct the request to employeesubjectaccessrequest@taboola.com. Please also include the date on which you received it, along with any other information that may help us efficiently respond to the request.
- 6.2 If you receive a Data Subject Rights Request from a User who interacts with the Taboola Content Discovery Platform, you should (1) immediately refer the Data Subject to Taboola's Data Subject Access Request Portal, available [here](#) and (2) immediately forward the request to Taboola's Privacy Team, at privacy@taboola.com, and please also include the date on which you received it, along with any other information that may help us efficiently respond to the request.
- 6.3 If you receive a Data Subject Rights Request from a Customer, you should immediately direct the request to Taboola's Privacy Team, at privacy@taboola.com. Please also include the date on which you received it, along with any other information that may help us efficiently respond to the request.
- 6.4 PRC data protection legislation demands that Taboola respond to requests within a very short time frame, so it is crucial that you immediately direct any Data Rights Requests you receive to the appropriate person indicated above without delay.

7. *Verification Process*

- 7.1 Taboola's Privacy Team will assess every Data Rights Request that we receive to determine whether Taboola is the processing entity or an entrusted party of the data requested. We may also need to verify that the request has been made by a genuine Data Subject (which may require that we request further identification of the requestor).
- 7.2 If we determine that Taboola is an entrusted party of the Data Subject's requested data, and that one of Taboola's Customers or another third party is the processing entity of this data, then Taboola shall notify the Customer or third party as soon as possible, per data protection regulations. Taboola shall also help the processing entity comply with the Data Subject Rights Request (in accordance with any contract terms which may be in place with the processing entity).

- 7.3 If we determine that Taboola is the processing entity of the Data Subject's requested data, Taboola shall contact the individual in writing to confirm receipt of the Data Subject Rights Request and seek confirmation of identity (if not already validated).
- 7.4 If Taboola is not exempt under applicable data protection laws from fulfilling the Data Subject Rights Request (see [Section 8.1, below](#)), then Taboola, to the extent it deems necessary, will request any further information needed to action the individual's request. Once Taboola has all the information it needs to honor the Data Subject Rights Request, Taboola will respond to the request in accordance with [Section 9, below](#).

8. *Exemptions from Requirement to Respond to a Data Subject Rights Request*

- 8.1 If Taboola is exempt from the requirement to fulfill a received Data Subject Rights Request, then Taboola will notify the individual that we intend to decline the Data Subject Rights Request and explain why an exemption applies. Employees should always forward inquiries to Taboola's Privacy Team, at privacy@taboola.com, who can make an assessment about whether such an exemption applies. Please never make this determination yourself.

9. *Timeframe for Responding to a Data Subject Rights Request*

- 9.1 Data Subject Rights Requests must be responded to without undue delay. It is imperative that you direct any requests that you receive immediately to Taboola Privacy Team, at privacy@taboola.com.

10. *Right To Be Informed*

- 10.1 Data subjects have the right to be informed of the processing activities. In particular, the PIPL requires that processing entities should provide the following information to Data Subjects prior to the processing of their personal information:
- (a) The identity and contact details of the processing entity;
 - (b) The purposes and methods of the processing;
 - (c) The type of Personal Information to be handled and the storage period;
 - (d) The methods and procedures for data subjects to exercise their rights;
 - (e) Other information that is required to be informed by laws and regulations;
and
 - (f) Changes to the above, if any.
- 10.2 If the above information is provided through privacy policies, such policies should be made public and easy to be accessed and saved. Data subjects have the right to request explanations on such policies.
- 10.3 Applicable privacy law and regulations outline two instances in which a controlling entity will be exempted from the above obligations: where law or regulation requires

that processing Personal Information be (1) confidential or (2) exempted from notification.

11. *Right To Determine, Restrict, and Refuse Data Processing*

- 11.1 Data Subjects have the right to determine whether to permit the processing activities proposed by data handlers, and have the right to restrict or refuse whole or part of such activities.
- 11.2 However, it is pending further clarification by PRC legislators as to how could a data subject exercise such rights (particularly for the circumstances where the data processing activities are relying on legal bases other than consent).

12. *Right Of Access And Right To Request A Copy Of Personal Information*

- 12.1 Data subjects have the right to access and request a copy of their personal information, whilst the PIPL provides exceptions to such rights where law or regulation requires the processing of Personal Information (either carried out by government authorities or other data handlers) to be confidential or be exempted from notification.

13. *Right To Rectify And Supplement*

- 13.1 Where the personal information is not accurate or complete, data subjects have the right to request data handlers to rectify or supplement the information in a timely manner (after necessary verification by data handlers).

14. *Right To Delete*

- 14.1 Data subjects have the right to request the deletion of their personal information, under the circumstances that data handlers fail to delete the information after one or more of following circumstances is triggered:
 - (a) The purposes of data handling have been achieved, or have failed to be achieved, or it is no longer necessary for achieving the purposes;
 - (b) The processing entity has ceased to provide the products or services, or the agreed storage period has expired;
 - (c) Data Subjects have withdrawn their consent;
 - (d) The processing entity has violated applicable laws or regulations or any agreement relating to the handling of personal information; or
 - (e) Other situations provided for by law or regulation.
- 14.2 Notably, if the statutory storage period is not expired (which may under other applicable laws and regulations) or it is technically unfeasible to delete the personal information, data handlers should cease the handling activities (except for taking necessary security measures and storage of information).

15. *Right Of Portability*

- 15.1 As an important change brought by the PIPL, data subjects are granted the right to request their personal information to be transferred to other designated data handlers, provided that such request satisfies certain conditions to be raised by Cyberspace Administration of China ('CAC').
- 15.2 However, the details on exercising such right are pending further clarification. Particularly, the CAC conditions are yet to be released to the public and it is also unclear as to the scope of personal information that could be portable.

16. *Right Relating to Automated Decisions*

- 16.1 Where the personal information is used for automated decision and such decision may cause material impact to personal rights and interests, data subjects have the right to request an explanation on such handling activity and refuse to accept any determination that is made merely relying on the automated decision.
- 16.2 Similarly, if the automated decision is applied for message pushes or marketing promotion, data subjects have the right to refuse such handling.

17. *Right Of The Deceased*

- 17.1 For the Personal Information of the deceased, the above rights to access, copy, rectify, and deletion could be exercised by his/her close relatives (for lawful and legitimate interests of their own), unless there exists other arrangement that is priorly made by the deceased.

COVID-19 Return to Office Data Use Notice

Overview

Due to the outbreak of the Coronavirus pandemic (COVID-19), Taboola's global offices were closed indefinitely to ensure the safety of our Employees. Taboola's management, legal, and HR departments have closely monitored health and safety guidance from the relevant national and regional authorities and the World Health Organization, particularly about measures required to safely reopen our offices. We will begin to do so on a regional, incremental, and voluntary basis. These office-specific guidelines set forth the Personal Data that will be collected from Employees that elect to return to the office before they are required to do so, and Taboola's limited uses and retention of their Personal Data for this purpose.

Israel Office Reopening

By choosing to return to the office, you agree to:

- *Only enter the office premises if you:*
 1. Are vaccinated for COVID-19 and hold a valid Green Pass; or
 2. Are a recovered COVID-19 patient and hold a valid Green Pass; or
 3. Hold a negative COVID-19 Test (PCR) from the preceding 72 hours or hold a negative rapid COVID-19 Test result from the same day; and
 4. Are not experiencing any specified COVID-19 symptoms or a temperature equal to or exceeding 38°C.

- *Notify office administrators or HR if:*
 1. You have received a positive COVID-19 Test result; or
 2. Your Green Pass is not valid.

- *Leave the office premises if:*
 1. At any time, you experience any COVID-19 symptoms; or
 2. Asked to do so by office administrators or HR because, as per the company's discretion, your presence creates a health risk to other Employees at the office; or

3. Your Green Pass is not valid.
- *Taboola will only collect the following Personal Data:*
 1. Names of Employees who provide a vaccination certificate or Green Pass.
 2. Vaccination status.
 3. Positive COVID-19 Test result.

Taboola will retain the Personal Data related to your vaccination status for as long as the Green Pass is valid and shall use it to activate your entrance card to the office. Taboola will retain this Personal Data for the minimum time necessary to comply with the local government's reporting obligations. It may be used only to (1) comply with any relevant reporting obligation to the relevant governmental authority, or (2) inform other individuals who may have been exposed, without disclosing any Personal Data of the Employee who received a positive COVID-19 Test result. To be clear, the Employee's Personal Data shall be made available only on a need-to-know basis to one or more of the following: (i) Office Administrators, (ii) IT, and (iii) HR.

London Office Reopening

By choosing to return to the office, you agree to:

- *Only enter the office premises if you:*
 1. Provide proof of a negative COVID-19 Lateral Flow Test result, administered within the preceding 72 hours, from NHS England (i.e., email or text notification); and
 2. Are not experiencing any specified COVID-19 symptoms or temperature equal or exceeding 38°C; and
 3. Have not received a positive COVID-19 Test result in the previous ten (10) days.
- *Notify office administrators or HR if you received a positive COVID-19 Test result*
- *Leave the office premises if:*
 1. At any time, your temperature is or exceeds 38°C; or
 2. Asked to do so by office administrators or HR because, as per the company's discretion, your presence creates a health risk to other Employees at the office.
- *Taboola will only collect the following Personal Data:*
 1. Names of employees working from the office.
 2. Names of employees who provide a positive COVID-19 Test result.

Taboola will retain this Personal Data for the minimum time necessary to comply with the local government's reporting obligations. It may be used only to (1) comply with any relevant reporting obligation to the relevant governmental authority, or (2) inform other individuals who may have been exposed, without disclosing any Personal Data of the Employee who received a positive COVID-19 Test result. To be clear, the Employee's Personal Data shall be made available only on a need-to-know basis to one or more of the following: (i) Office Administrators, (ii) IT, and (iii) HR.

New York Office Reopening

By choosing to return to the office, you agree to:

- *Only enter the office premises if you:*
 1. Are vaccinated for COVID-19 and hold either a valid COVID-19 Vaccination Record Card or a valid Excelsior Pass; and
 2. Are not experiencing any specified COVID-19 symptoms or temperature which is equal to or exceeds 100°F (38°C); and
 3. Have not received a positive COVID-19 Test result in the previous ten (10) days.

- *Notify office administrators or HR if you have received a positive COVID-19 Test result.*

- *Leave the office premises if:*
 1. You are not vaccinated for COVID-19; or
 2. At any time, you are experiencing any specified COVID-19 symptoms or temperature which is equal to or exceeds 100°F (38°C).

- *Taboola will only collect the following Personal Data:*
 1. Names of employees who provide evidence of vaccination status.
 2. Names of employees notify office administrators or HR of a positive COVID-19 Test result.

Taboola will retain this Personal Data for the minimum time necessary to comply with the local government's reporting obligations. It may be used only to (1) comply with any relevant reporting obligation to the relevant governmental authority, or (2) inform other individuals who may have been exposed, without disclosing any Personal Data of the Employee who received a positive COVID-19 Test result. To be clear, the Employee's

Personal Data shall be made available only on a need-to-know basis to one or more of the following: (i) Office Administrators, (ii) IT, and (iii) HR.

France Office Reopening

We encourage Employees who return to the office to first be vaccinated or receive a negative COVID-19 Test (PCR) result. Should an Employee receive a positive COVID-19 Test result, that Employee has a legal obligation to notify the French Social Security Authorities, and such authorities shall notify any individuals who may have been exposed. Should an Employee voluntarily choose to notify Taboola about a positive COVID-19 Test result or exposure, Taboola will inform other individuals who may have been exposed, without disclosing any Personal Data of the Employee who received a positive COVID-19 Test result.

By choosing to return to the office, you agree to:

- *Only enter the office premises if you:*
 1. Are not experiencing any specified COVID-19 symptoms or temperature equal to or exceeding 38°C; and
 2. Have not received a positive COVID-19 Test result in the previous ten (10) days
- *Leave the office premises if you are experiencing any specified COVID-19 symptoms, or if your temperature is or exceeds 38°C*
- *Notify your country manager in case you are unwell and intend to leave the office*
- *Taboola will only collect names of Employees working from the office to inform of any exposures that are voluntarily brought to Taboola's attention*

Spain Office Reopening

We encourage Employees who return to the office to first be vaccinated or receive a negative COVID-19 Test (PCR) result. Should an Employee receive a positive COVID-19 Test result, the Employee must immediately contact their country manager. Taboola will inform other individuals who may have been exposed, without disclosing any Personal Data of the Employee who received a positive COVID-19 Test result. Additionally, should an Employee experience COVID-19 symptoms or receive a positive COVID-19 Test result,

the Employee must immediately contact the telephone number provided by the corresponding Autonomous Community or health center.

By choosing to return to the office, you agree to:

- *Only enter the office premises if you:*
 1. Are not experiencing any specified COVID-19 symptoms or temperature equal to or exceeding 38°C; and
 2. Have not received a positive COVID-19 Test result in the previous ten (10) days.
- *Leave the office premises if you are experiencing any specified COVID-19 symptoms, or if your temperature is or exceeds 38°C.*
- *Notify your country manager in case: (i) you are unwell and intend to leave the office; or (ii) receive a positive COVID-19 Test result.*
- *Taboola will only collect the following Personal Data:*
 1. Names of Employees working in the office.
 2. Names of Employees who provide a positive COVID-19 Test result.

Taboola will retain this Personal Data for the minimum time necessary to comply with the local government's reporting obligations. It may be used only to (1) comply with any relevant reporting obligation to the relevant governmental authority, or (2) inform other individuals who may have been exposed, without disclosing any Personal Data of the Employee who received a positive COVID-19 Test result. To be clear, the Employee's Personal Data shall be made available only on a need-to-know basis to the country manager and HR.

Turkey Office Reopening

By choosing to return to the office, you agree to:

- *Only enter the office premises if you:*
 3. Are not experiencing any specified COVID-19 symptoms or temperature equal to or exceeding 38°C; and
 4. Have not received a positive COVID-19 Test result in the previous ten (10) days.

- *Leave the office premises if you are experiencing any specified COVID-19 symptoms, or if your temperature is or exceeds 38°C. Should you experience COVID-19 symptoms or receive a positive COVID-19 Test result, you must also visit the nearest medial institution.*
- *Notify your country manager in case: (i) you are unwell and intend to leave the office; or (ii) you receive a positive COVID-19 Test result.*
- *Taboola will only collect the following Personal Data:*
 1. Names of Employees attending the office.
 2. Names of Employees who reported testing positive for COVID-19.

Taboola will retain this Personal Data for the minimum time necessary to comply with the local government's reporting obligations, if any. It may be used only to (1) comply with any relevant reporting obligation to the relevant governmental authority, or (2) inform other individuals who may have been exposed, without disclosing any Personal Data of the Employee who reported testing positive for COVID-19. To be clear, the Employee's Personal Data shall be made available only on a need-to-know basis to the country manager and HR.

Germany Office Reopening

We encourage Employees who return to the office to first make sure they obtained a negative result of COVID-19 Lateral Flow Test. The test kit will be available for you at the office. Should an Employee voluntarily choose to notify Taboola about a positive COVID-19 Test result or exposure, Taboola will inform other individuals who may have been exposed, without disclosing any Personal Data of the Employee who received a positive COVID-19 Test result.

By choosing to return to the office, you agree to:

- *Only enter the office premises if you:*
 1. Are not experiencing any specified COVID-19 symptoms or temperature equal to or exceeding 38°C; and
 2. Have not received a positive COVID-19 Test result in the previous ten (10) days
- *Leave the office premises if you are experiencing any specified COVID-19 symptoms, or if your temperature is or exceeds 38°C*

- *Notify your country manager in case you are unwell and intend to leave the office*

Taboola will only collect names of Employees working from the office to inform of any exposures that are voluntarily brought to Taboola's attention

LA Office Reopening

By choosing to return to the office, you agree to:

- *Only enter the office premises if you:*
 1. Are vaccinated for COVID-19 and hold a valid COVID-19 Vaccination Record Card; and
 2. Are not experiencing any specified COVID-19 symptoms or temperature which is equal to or exceeds 100°F (38°C) for at least 24 hours prior to entering the premises without the aid of any medicine; and
 3. Have not received a positive COVID-19 Test result in the previous ten (10) days.
- *Notify HR if you have received a positive COVID-19 Test result.*
- *Leave the office premises if:*
 1. You are not vaccinated for COVID-19; or
 2. At any time, you are experiencing any specified COVID-19 symptoms or temperature which is equal to or exceeds 100°F (38°C).
- *Taboola will only collect the following Personal Data:*
 1. Names of employees who provide evidence of vaccination status.
 2. Photo ID.
 3. Vaccination type and date of last dose.
 4. Names of employees who notify office administrators or HR of a positive COVID-19 Test result.

Taboola will retain this Personal Data for the minimum time necessary to comply with the local government's reporting obligations. It may be used only to (1) comply with any relevant reporting obligation to the relevant governmental authority, or (2) inform other individuals who may have been exposed, without disclosing any Personal Data of the Employee who received a positive COVID-19 Test result. To be clear, the Employee's

Personal Data shall be made available only on a need-to-know basis to one or more of the following: (i) Office Administrators, (ii) IT, and (iii) HR.

Other Regional Offices

This COVID-19 Return to Office Data Use Notice shall be updated from time to time and when additional Taboola offices reopen in the coming months.

Contact

If you have any questions about this COVID-19 Return to Office Data Use Notice, please contact Taboola's Privacy Team at privacy@taboola.com, or your designated human resources representative as listed below:

- (a) In APAC: Anjali Oldfield, anjali.o@taboola.com
- (b) In Israel: Efrat Israeli-Koren, efrat.i@taboola.com
- (c) In EMEA: Anjali Oldfield, anjali.o@taboola.com
- (d) In the United States: Lana Saad, lane.s@taboola.com
- (e) In Brazil and Latin America: Natalie Coggins, natalie.c@taboola.com