

Recruitment Privacy notice

ABOUT THIS NOTICE

Last Updated: March , 2025.

Radcom Ltd. and its affiliated companies (collectively: “**Radcom**”, “**we**”, “**us**”, and “**our**”) put great efforts in making sure that we secure personal data related to you and use it properly. This notice (this “**notice**”) explains our privacy practices and how we handle personal data related to you as a job applicant when you apply for a job with us.

Specifically, this notice will provide details about the personal data that you provide us as a job applicant, what we do with personal data and how we process, retain and share it, and the rights that you may have in connection with personal data.

This notice does not apply to our processing activities related to our products and services.

The summary below will give you a quick and clear view of our practices. The first nine (9) headings in the summary also serve as our “**notice at collection**”, where we need to provide you with such a notice under applicable law. Please, however, take the time to read our full notice. If you disagree with its terms, please do not participate in the interview.

In this notice, the term “**personal data**” refers to any data related to you that we collect, process, use and retain in connection with your job application, and the term “**processing**” refers to any action we perform on personal data, including collecting, using, retaining, and deleting it.

SUMMARY OF THIS NOTICE & NOTICE AT COLLECTION

NOTICE AT COLLECTION	WHAT PERSONAL DATA DO WE COLLECT AND USE?	We record, collect, store, and analyze personal data, including personal data connected to your identity and job application; contact information; other Sensitive personal data; use of or access to equipment. Read More.
	WHAT SENSITIVE PERSONAL DATA WE COLLECT AND USE	We collect and use Sensitive personal data you provide us for the purpose of supporting our recruitment process. Read More.
	WHOSE PERSONAL DATA WE PROCESS	We process personal data related to our prospective (nominees) employees. Read More.
	HOW DO WE COLLECT PERSONAL DATA?	We collect personal data directly from you during your recruitment process, through the application and recruitment process and from third parties. Read More.
	WHY WE COLLECT AND USE PERSONAL DATA?	We collect and use personal data primarily to manage our recruitment process, including management of access and usage, compliance with applicable laws, regulations, and diversity requirements, and for defense against cyber-security attacks. Read More.
	HOW LONG DO WE RETAIN PERSONAL DATA?	We retain personal data for the period necessary to fulfill the purposes, rights, and obligations that this notice outlines. We may retain records relating to our job applicants f as reasonably time necessary to comply with our legal obligations, to resolve disputes, prevent fraud and abuse, enforce our agreements or otherwise protect our legitimate interests. Read More.
	WHO HAS ACCESS TO PERSONAL DATA?	We will share personal data internally, mainly with members of our People (HR) and Finance departments, your direct potential manager, senior management, and our IT staff, if access to personal data is necessary to them for the performance of their roles. Read More.
	LAWFUL GROUNDS FOR PROCESSING PERSONAL DATA	All processing of personal data related to you that is not based on the lawful grounds indicated in this policy, or if such lawful grounds may not be used for the processing of personal data related to you based on your territory, is based on your consent. Read More.
	WHAT ARE YOUR CHOICES AND RIGHTS?	You may request to access, correct, delete, or obtain a copy of personal data we have about you. Depending on applicable law, you may have additional rights available to you. Read More.
WHO DO WE SHARE PERSONAL DATA WITH?		We share personal data with our affiliates, suppliers, and vendors, to fulfil the Purposes of processing outlined in this notice. We share personal data with Institutions and authorities, when we are required to do so by law, or to respond to legal processes; to maintain our security; and, to protect our legal rights and interests. Read More.
SELLING PERSONAL DATA		We do not sell personal data. Read More.
WHAT ARE YOUR OBLIGATIONS?		It is important that the personal data that we hold about you throughout your job application is accurate and up to date. Please keep us informed if personal data related to you changes. Read More.
HOW DO WE SECURE PERSONAL DATA?		We have implemented administrative, technical, and organizational security measures as well as policies and procedures to protect personal data. Read More.

**INTERNATIONAL DATA
TRANSFER**

We transfer personal data between various sites located in Israel, the EEA (European Economic Area), the U.S., Canada, India, and additional territories. Whenever we transfer personal data beyond the country of origin, we will do so in accordance with applicable laws. [Read More](#).

WHAT PERSONAL DATA DO WE COLLECT AND USE?

When you apply for a job with us, we will ask you to provide certain personal data that will help us evaluate your qualifications and candidacy and to stay in touch with you during the application and recruitment process.

The specific categories of personal data that we process in connection with job applications and how we use it are determined based on the requirements of the country in which the role you apply for is located and your country of residence.

If you apply to more than one location, the categories of personal data we process and how we use it will be determined based on the requirements of all relevant countries.

As part of our recruitment processes, we record, collect, store, and analyze personal data that you provide us and that we receive or collect about you, including:

CATEGORY	DESCRIPTION
Identifiers and contact information	such as: first name, surname, title, date of birth, place of birth, address (street, zip code, country), phone number, email address.
Professional, Employment, and Education Information	<ul style="list-style-type: none"><u>Personal data related to eligibility</u>: current salary, benefits, tax and pension-related information, performance-related information, recruitment history, background checks, resume/CV, cover letter, employment history (employers, job titles, length of employment), educational background and training, linguistic capabilities, job skills, and personal interests.<u>Verification and Background Information</u>: Diplomas, certificates, national IDs, driver's license, passport, social security, and birth certificate.<u>Reference materials and documents</u>: Job references and letters of recommendation, job salary/payment history, military records, titles and licenses, immigration visa status, security clearance, background checks including criminal history (where permitted by law);
Social Media Information	Social media information such as your LinkedIn profile;
Online Identifiers and Internet Network Activity Information	When you visit our 'Careers' online webpages available at: Career Opportunities RADCOM or view job positions, or click on the 'Apply' button for specific positions, we and our third party service providers collect information such as the IP address of your device, which provides your device's location (up to the city where you are located and not precise geo location), and other non-identifiable information that is used for analytical purposes, such as the type of browser, browser language, type of operating system, domain name of Internet service provider, web pages visited, times and dates of visits and the content you access on and/or through the Website.
Inferences	Inferences drawn from the personal data listed above.

WHAT SENSITIVE PERSONAL DATA WE COLLECT AND USE?

Subject to any limitations under applicable laws, we collect and use the following sensitive personal data that you provide us and that we receive or collect about you for the purpose of supporting our recruitment process:

- Government issued IDs, such as a national or state identification card, social security number, driver's license, or passport number.
- The contents of an individual's mail, email, and text messages unless we are the business that is the intended recipient of the communication.

We do not sell such data, or use or disclose it to infer characteristics about you or for cross-contextual behavioral advertising.

WHOSE PERSONAL DATA WE PROCESS?

We will process personal data related to you if you are a current, former, or prospective employee, partner, worker, intern, agency worker, consultant, director, or contractor of ours.

We will also process personal data in relation to dependents or other family members of the above people, in the circumstances set out in the section titled "Why We Collect and Use personal data?".

HOW DO WE COLLECT PERSONAL DATA?

We obtain the categories of personal data listed above from the following categories of sources:

- Through the application and recruitment process, either directly from you when you apply for a job, or from recruitment service providers or consultants if such were involved.
- From third parties including former employers, or other information providers, and, subject to applicable laws, through background checks.
- If you use our online application system to apply for a job, our HR platform service provider will collect personal data related to you on our behalf. Comeet Technologies Inc is our third-party service provider that handles our job recruitment process. (See further information under Comeet's privacy policy available at: [Privacy Policy | Comeet Help Center](#)). We may decide to change our job recruitment service provider.
- From publicly available sources, such as social media.

WHY WE COLLECT AND USE PERSONAL DATA?

We collect and use personal data primarily to manage our recruitment process (the “**Purposes**”), including:

- To fulfill or meet the reason you provided the information. For example, assess your skills, qualifications, and process your application and candidacy for any of our positions;
- To communicate with you regarding such recruitment processes;
- To enable the use of the Website. For example, to submit your CV;
- To contact you with proposals and tailored information regarding new relevant positions in Radcom, which you might be a suitable candidate for;
- To provide, support, personalize, and develop our website by learning about your preferences and general trends relating to the Website;
- To personalize your website experience and to deliver content relevant to your interests, regarding new positions, events, offers, including targeted offers and ads through our websites, third-party service providers' sites or via email;
- To administer and inform you about compensation and benefits or information relating to your potential employment;
- To manage, maintain and document recruitment and other HR-related activities and personnel based on aggregated statistical data that has been rendered deidentified, for further development and improvement of our recruitment processes;
- To manage business operations and governance, for example: auditing, HR development and handling fraud and other violations of the law;
- To comply with legal and other mandatory requirements, including to obey orders and subpoenas, and to comply with supervision and enforcement actions;
- To support any corporate structure change, including mergers, acquisition, and other corporate transactions;
- To monitor your use of any information and communication systems that we will make available to you during your recruitment process and for cyber security purposes; and,
- To act as permitted by, and to comply with, any legal or regulatory requirements, including equal opportunity, diversity, and inclusion requirements and to protect our legal rights;

HOW LONG DO WE RETAIN PERSONAL DATA?

Retention periods can vary based on how long the recruitment process lasts and the period between your initial application and our hiring decision.

If your application for employment is successful, personal data received during the recruitment process shall be transferred to your personnel file and retained during your employment subject to our then in effect employees' privacy policy, to be provided to you upon request by our relevant HR department.

If your application for employment is unsuccessful, We may retain your data even after the applied position has been filled or closed. This is done so we could reconsider job applicant for other positions and opportunities and as reasonably necessary to comply with our legal obligations, to resolve disputes, prevent fraud and abuse, enforce our agreements or otherwise protect our legitimate interests. Upon the conclusion of these periods, or if you withdraw your consent during the extended period, personal data related to you shall be deleted or destroyed.

Also, at any time, you can opt-out of the collection of personal data by our service providers (Please see “What are your Choices and Rights” section).

You can let us know that you would like us to retain personal data related to you for a longer period, so as to consider you for future job postings.

WHO HAS ACCESS TO PERSONAL DATA?

We will share personal data internally, mainly with members of our HR and Finance departments, your potential direct manager, senior management, and our IT staff in appropriate circumstances if access to the personal data is necessary for performance of their roles.

Access to personal data related to you within our subsidiaries is restricted to those who need to obtain access to it for the purposes outlined above, and generally they will only have access to that part of the information relating to you that is relevant to the particular purpose concerned.

We will disclose certain personal data related to you to our auditors and other professional advisors or consultants providing services to us that require such disclosure.

LAWFUL GROUNDS FOR PROCESSING PERSONAL DATA

All processing of personal data related to you that is not based on the lawful grounds indicated below, or if such lawful grounds may not be used for the processing of personal data related to you based on your territory, is based on your consent.

- We Process your job application related data to perform the recruitment process contract with you.
- We will also Process personal data related to you to comply with our obligations under applicable law and to protect your and others' vital interests.
- We will further rely on our legitimate interests, which we believe are not overridden by your fundamental rights and freedoms, for example: (1) our HR and corporate management purposes; and (2) cyber security and fraud detection.

WHAT ARE YOUR CHOICES AND RIGHTS?

You have certain rights relating to our processing of personal data related to you, subject to local data protection laws. Depending on the applicable laws, these rights may include the following rights:

RIGHT	DESCRIPTION
Right of Access	You have the right to request access to personal data related to you that we process, as well as additional information about our processing activities, for example the purposes of processing, categories of data involved, third parties who receive the data, retention period, the right to file a complaint with the supervisory authority, the source of the data (if not collected from you) and details about automated processing of the data, including profiling.
Right to Rectification	You have the right to require the rectification of inaccurate personal data, or complete incomplete personal data concerning you.
Right to Erasure (Right to be Forgotten)	You may request that we erase personal data related to you in our possession, if: <ul style="list-style-type: none">• the personal data is no longer necessary pursuant to the Purposes;• you withdraw your consent when the processing is based on consent and there is no other legal ground for the processing;• you object to the processing and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to your right to object;• the personal data have been unlawfully processed; or,• the personal data must be erased to comply with the Privacy Laws.
Right to Restrict processing	You have the right to restrict the processing of personal data by us if the accuracy of the data is contested by you, or the processing is unlawful, and you oppose the erasure of the data, or we no longer need to process the data, but you need to retain the data for legal proceedings.

Right of Portability	Where our processing of personal data related to you is based on your consent, you have a right to have personal data related to you transmitted to another controller.
Right to Object (an "opt-out" right)	You have the right to object to the processing of personal data related to your particular situation, if the processing (including profiling) is carried out for the public interest or by official authority, or the processing is based on our legitimate interests.
Automated Decision Making	You have the right not to be subject to a decision based solely on automated processing. We may use our service providers' automated platforms to identify appropriate job candidates and process their personal data. However, our decision whether to hire you or not is made by our HR staff.
Right to Unsubscribe	You have the right to unsubscribe from receiving communications, at any time by using an unsubscribe link in the messages sent or an alternative method.
Opt-out of Selling or Sharing	You have the right to direct us to refrain from selling or sharing (within the meaning of U.S. privacy laws and regulations) personal data related to you to third parties. You can allow another person to exercise this right on their behalf.

To exercise any of the abovementioned rights, please contact us at: privacynotice@radcom.com. Upon your request and based on the rights afforded to you under applicable law, we will respond to your request promptly.

Please note the following:

- We may require additional information in order to verify your request;
- If you will not respond within 14 days from our initial verification email, you will be notified that your request was closed, and we will not be able to accommodate it;
- Your request will be recorded by us for legal obligations; and,
- We may charge a reasonable fee or refuse to act on a request if such request is excessive, repetitive, manifestly unfounded, or if we required to or allowed by applicable law or regulation. You will not receive discriminatory treatment, and you will not be retaliated against for exercising your rights.

You have a right to lodge a complaint with a privacy and data protection supervisory authority of your habitual residence, place of work or of an alleged infringement of applicable laws governing the protection of privacy. You can also contact us at: privacynotice@radcom.com.

We will do our best to respond to your request within 30 days of its receipt (unless otherwise required under applicable laws). If we require more time (up to an additional 30 days), we will inform you of the reason and extension period in writing. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. The response we provide will also explain the reasons for our inability to comply with your request, if applicable.

WHO DO WE SHARE PERSONAL DATA WITH?

We will share personal data in the following instances:

- With our third-party service providers, such as the job recruitment service provider that handles our job recruiting, hiring, and on-boarding process, or with any additional service provider which helps us with the recruiting process. Comeet Technologies Inc is our third-party service provider that handles our job recruitment process. (See further information under Comeet's privacy policy available at: [Privacy Policy | Comeet Help Center](#)). We may decide to change our recruitment service provider, with third-party service providers that provide legitimate business functions for us, which will include processing personal data. Such third-party service providers are engaged by us for the provision of, among others, data storage, information security and employee background checks.
- With competent supervisory authority, if we determine that doing so is in accordance with, or is otherwise required by applicable law, regulation, judicial or legal process.
- With law enforcement or other authorities (including immigration, health, tax, national security) when it is necessary to protect the interests of our company or individuals.
- With another entity when it is required as part of a merger, acquisition, or assignment of part or all our business with that entity, or any other change of corporate structure.

SELLING & SHARING PERSONAL DATA

We do not sell personal data within the meaning of US state consumer privacy laws. We engage third parties to provide us with services such as analytics, marketing automation and user experience and allow them to collect personal data (online identifiers and internet activity) on our Websites. We will also share such personal data with third-party advertisers for purposes of targeting advertisements on third-party websites, applications and services.

We do not knowingly sell or share personal data of individual who are under 16 years of age.

These third-parties do not pay us for collecting such information, but the right granted to them to collect personal data may be considered as disclosure for the purpose of sale or sharing for cross-context behavioral advertising under applicable laws governing the protection of privacy. At any time, you can opt-out of the collection of personal data by such service providers by contacting us.

WHAT ARE YOUR OBLIGATIONS?

It is important that personal data that we hold about you during the recruitment process is accurate and current. Please keep us informed if personal data related to you changes.

You must inform your dependents whose information you provide to us about the content of this notice and provide them with a copy of this notice and any relevant policies.

You must also comply with this notice and our policies, standards, and procedures that are brought to your attention when handling any information to which you have access in the course of your relationship with us, including any personal data related to other individuals. In particular, you will not access or use any information for any purpose other than in connection with and to the extent necessary for your work with us. These obligations continue to exist after termination of your job application with us

HOW DO WE SECURE PERSONAL DATA?

We have implemented administrative, technical, and organizational security measures, as well as policies and procedures, based on industry best practices, to protect your Information. These measures and procedures are designed to protect personal data against risks, such as temporary or permanent loss, destruction, and unauthorized or unlawful access, alteration, use or disclosure. Please note, however, that there are inherent risks in transmission of information over the internet or other methods of electronic storage and we cannot guarantee that unauthorized access or use of your information will never occur.

We require our suppliers and vendors to apply similar security measures and procedures when they access or use personal data that they process on our behalf.

INTERNATIONAL INFORMATION TRANSFER

We transfer personal data between various sites located in Israel, the EEA, the U.S., Canada, India, Brazil, APAC and additional territories to operate our business efficiently, to improve performance, and to create redundancies to protect information in the event of an outage or other malfunctions. Such a transfer is done in accordance with applicable law.

Before transferring the personal data, we will assess risks involved with the transfer, enter into relevant information transfer agreements, adhere to applicable security and confidentiality requirements, or take other measures to lawfully transfer the personal data.

If applicable laws permit us to rely on your consent to transfer personal data related to you, then by submitting your application you signify your consent to such transfer.

OUR POLICY TOWARDS CHILDREN

We do not intend and do not knowingly collect or sell personal data from children under the age of sixteen (16). We reserve the right to request proof of age when needed. If we learn that we have collected personal data from children under the age of sixteen (16) we will delete that information promptly.

Please contact us at privacynotice@radcom.com if you have reasons to suspect that we collected such information.

CONTACT US

We are committed to protecting your privacy. Should you have any questions concerning this Policy, please contact us at: privacynotice@radcom.com or send a letter to our headquarters located at Raoul Wallenberg St 24, Tel Aviv-Yafo, Israel.