

PRIVACY POLICY

[Last Updated: October 30, 2025]

1. INTRODUCTION AND SCOPE OF THIS PRIVACY POLICY

This Privacy Policy ("Privacy Policy") describes how XPlace Ltd. ("XPlace", "we", "us") collects, uses, and processes Personal Data (as defined below) of individuals who access or use our online platform and related services (collectively, the "Services"). This Privacy Policy explains the types of Personal Data we collect, why we collect your Personal Data, the purposes for which we use it, how long we retain it, with whom we share it, and the rights you have in relation to your Personal Data, as well as how you can exercise those rights, all in accordance with the Israeli Privacy Protection Law, 1981, and any applicable regulations ("Privacy Protection Law").

This Privacy Policy applies to our data collection and privacy practices in connection with:

- Visitors and users of our website available at <https://www.xplace.com> ("Website" or "Platform");
- Freelancers who register and offer professional services through the Platform ("Freelancers"); and
- Clients, businesses, or organizations who post projects or seek to hire Freelancers through the Platform ("Employers" or "Clients").

Freelancers and Employers are collectively referred to as "Users" or "you".

This Privacy Policy **does not** apply to information exchanged directly between Freelancers and Clients outside of the Platform, or to information relating to XPlace employees, job applicants, or suppliers.

This Privacy Policy forms an integral part of our [Terms of Use](#). Capitalized terms used herein but not defined shall have their respective meaning assigned to them therein.

ANY PERSONAL DATA YOU PROVIDE IS MADE AT YOUR FREE WILL AND CONSENT (WHERE REQUIRED UNDER APPLICABLE DATA PROTECTION LAWS), AND YOU ACKNOWLEDGE THAT YOU ARE NOT UNDER ANY STATUTORY OBLIGATION TO PROVIDE PERSONAL DATA TO XPLACE. HOWEVER, IF YOU DO NOT PROVIDE US WITH CERTAIN PERSONAL DATA, WE WILL NOT BE ABLE TO FULFILL CERTAIN PURPOSES, FOR EXAMPLE, PROVIDE CERTAIN SERVICES OR COMMUNICATE WITH YOU REGARDING ANY INQUIRIES YOU SUBMIT - ALL AS DESCRIBED UNDER SECTION 4 OF THIS PRIVACY POLICY WHICH DETAILS THE PURPOSES FOR WHICH EACH PERSONAL DATA SET IS COLLECTED.

2. POLICY AMENDMENTS

We reserve the right to amend this Privacy Policy from time to time, at our sole discretion. The most recent version of this Privacy Policy will always be posted on the Website and the update date will be reflected in the "Last Updated" heading. We will provide notice to you if these changes are material, and, where required by applicable law, we will obtain your consent. Any

amendments to the Privacy Policy will become effective immediately, unless we notify otherwise. We recommend you review this Privacy Policy periodically to ensure that you understand our most updated privacy practices.

3. CONTACT INFORMATION AND DATA CONTROLLER INFORMATION

XPlace Ltd., company number 516581550, a company incorporated under the laws of the State of Israel, is the “data controller” (as such term is defined under applicable privacy and data protection legislation) of the Personal Data collected which is subject to this Privacy Policy. This means that we are responsible for deciding how your Personal Data is processed (purpose and means), as well as implementing applicable measures to secure the Personal Data we store, and where applicable, enabling you to exercise your rights.

For any question, inquiry or concern related to this Privacy Policy or the processing of your Personal Data, you may contact as follows:

Address: 2 Bnei Berman St., Ir Yamim Tower, Netanya, Zip Code 4249330, Israel

Email: privacy@xplace.co.il

4. TYPES OF PERSONAL DATA COLLECTED AND PURPOSES OF USE

When accessing or using the Services, XPlace may collect and use different types of information, depending on the nature of your interaction with us and the Services you use. Such information may include:

- **Personal Data** – information relating to an identified or identifiable individual, either directly or indirectly. For example, information that can be used to contact or identify you personally, such as your name, email address, phone number, and usage data linked to your account (e.g., viewed projects, proposals submitted, etc.).
- **Non-Personal Data** – anonymous or aggregated data that cannot be used to identify you personally, such as technical information transmitted from your device (browser type, language, device type), and statistical data regarding your use of the Platform (e.g., date and time of access, duration and frequency of use, pages viewed, advertisements clicked, etc.). XPlace may use such Non-Personal Data without limitation, primarily for operating the Platform, improving the Services and User experience, internal analytics, and marketing optimization within the AllJobs Group (as defined in Section 6 below). For the avoidance of doubt, any Non-Personal Data connected or linked to Personal Data will be treated as Personal Data for as long as such connection or linkage exists.

XPlace may collect the above information either directly from you or automatically through technologies such as cookies and other tracking tools. Below we detail the Personal Data we collect and how and for which purposes we process and use your Personal Data

- *Contact, Support, and Marketing Information*

When you contact us through any communication channel (for example, by email, through an online contact form, or via the chat function on our Website), or if you subscribe to receive marketing materials or updates from us, we collect your contact details such as your full name, email address, and phone number, as well as the content of your inquiry and any additional information you choose to provide (“**Contact, Support, and Marketing Information**”). If you are a Freelancer using our lead conversation management services, we collect your phone number and link it to a temporary number displayed on your profile. This paid service requires payment details, which are processed securely by our payment provider who stores your full credit card information.

We process Contact, Support, and Marketing Information to: (i) respond to your inquiries, requests, or support needs and provide you with the information or service you requested; (ii) forward your inquiry internally or to other entities within the AllJobs Group, where relevant to your request; (iii) send you marketing communications and promotional materials about our Services or related offerings (if you have subscribed to receive such materials); (iv) analyze engagement with our marketing campaigns and improve our communication strategies; (v) for internal analytics and statistical purposes; and (vi) maintain internal records of communications and service interactions for quality assurance, compliance, and dispute resolution. You may opt out of receiving marketing communications at any time by using the “unsubscribe” option included in our messages.

- *Online Identifiers and Usage Data*

When you access or interact with our Website, we may collect certain online identifiers such as your Internet Protocol (IP) address, cookie identifiers, browser type, and device information, as well as data related to your interactions with the Website (for example, session duration, pages viewed, referring URLs, user interface clicks, crash data, and language preferences) (“**Online Identifiers and Usage Data**”).

We process Online Identifiers and Usage Data to: (i) operate, maintain, and secure the Website and ensure its proper functionality; (ii) detect, prevent, and address technical issues, errors, or fraudulent activities; (iii) perform analytics, measure Website performance, and improve our content and user experience; and (iv) conduct digital marketing activities, including targeted advertising and measurement of campaign effectiveness, subject to your cookie preferences.

- *Freelancer Account Data*

When you register as a Freelancer, we collect the information necessary to create and manage your account, such as your name, email address, phone number, and password. You may also choose to create a personal profile containing additional information such as education, professional experience, certifications, portfolio samples, pricing, and other details you voluntarily provide (“**Freelancer Account Data**”). To submit a price quote for a project, you must join as a paid subscriber and provide appropriate payment details. Please note that we do not collect your complete payment details, and your full credit card number is collected and stored only by our payment processing provider.

This includes information from your personal profile such as your photo (if you choose to

upload one), details about your education, work experience, courses, certificates and professional qualifications, volunteer activities, intellectual property (such as patents), relevant links, past projects, work samples, rates, recommendations, and any additional information you choose to share in your profile.

We process Freelancer Account Data to: (i) create and manage your Freelancer account, authenticate your identity, and enable you to access and use the Services; (ii) allow you to create and manage your personal profile and to display it to Clients who may be interested in your services; (iii) send you notifications about relevant projects, updates, surveys, or feedback requests; (iv) contact you regarding incomplete registrations or account setup; (v) send you marketing communications and promotional offers related to our Services, subject to your consent and applicable law; (vi) share your information, where applicable and with your consent, with companies within the AllJobs Group for marketing or project-matching purposes; and (vii) conduct internal analytics and statistical purposes.

- *Client Account Data*

When you register as a Client, we collect the information necessary to create and manage your account, such as your name, email address, phone number, and password. We may also collect information about your activity on the Platform, such as posted projects, viewed content, and interactions with Freelancers (“**Client Account Data**”).

We process Client Account Data to: (i) create and manage your Client account, authenticate your identity, and enable you to post and manage projects; (ii) facilitate communication between Clients and Freelancers and to send you notifications about relevant Freelancers or project updates; (iii) contact you regarding incomplete registrations or account setup; (iv) send you marketing communications and promotional offers related to our Services, subject to your consent and applicable law; and (v) conduct internal analytics and statistical purposes.

In addition to the purposes described above, the Company may retain and use Personal Data to comply with and/or document compliance with its legal obligations, prevent illegal activities and/or violations of the Website's Terms of Use and/or misuse of the Services, as well as, when necessary, in case of disputes and/or claims from users and for the purpose of managing legal proceedings.

5. COOKIES AND TECHNOLOGICAL TOOLS

We use “cookies” (or similar tracking technologies such as tags and pixels) when you interact with our website. The use of cookies is a standard industry-wide practice. Cookies and similar technologies are a small piece of information, text or code that a website assigns and stores on your computer or browser while you access a website.

Cookies are small text files that are stored by our server on your computer or browser when you visit our Website. These files may collect information such as your IP address, device type, browser type, language preferences, session duration, and pages viewed. Some cookies are

essential for the Website's operation, while others are used for analytics, performance measurement, and marketing purposes.

We use both **first-party cookies** (set by XPlace) and **third-party cookies** (set by our partners, such as analytics and advertising providers). The duration of cookies may vary - some are deleted when you close your browser ("session cookies"), while others remain on your device for a longer period ("persistent cookies").

Certain third parties that provide us with advertising or analytics services may independently collect and use data through cookies and similar technologies. These third parties may combine the data collected from your interaction with our Website with other information they have collected from your online activities across their network of websites, for the purpose of providing you with targeted advertising and aggregated analytics. The collection and use of data by these third parties are subject to their own privacy policies.

Below are some of the main third-party tools we use and links to their respective privacy policies:

- **Google Analytics, Google Tag Manager, Google DoubleClick, Google Ads**

Purpose: Analytics, performance measurement, and advertising (including personalized advertising).

Privacy Policy: <https://policies.google.com/privacy?hl=iw>

Opt-Out Options: <https://tools.google.com/dlpage/gaoptout>

- **Facebook**

Purpose: Advertising and performance measurement.

Privacy

Policy: <https://he-il.facebook.com/privacy/policy?subpage=1.subpage.4-InformationFromPartnersVendors>

- **LinkedIn**

Purpose: Advertising, analytics, and performance measurement.

Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>

Cookie Policy: <https://www.linkedin.com/legal/cookie-policy>

- **Hotjar**

Purpose: Session recordings and behavioral analytics.

Privacy Policy: <https://www.hotjar.com/legal/policies/privacy>.

Managing Cookies and Opt-Out Options:

You can manage your cookie preferences through your browser settings. Most browsers allow you to delete existing cookies, block the acceptance of new cookies, or receive a notification

before a cookie is stored. Please note that disabling or deleting cookies may affect the functionality of certain parts of the Website and limit your user experience.

For more information on managing cookies in your browser, please refer to the following resources: <https://support.google.com/chrome/answer/95647?hl=iw&co=GENIE.Platform%3DDesktop>

Please note that if you choose to disable cookies, some features of our Website may not function properly, and your browsing experience may be limited.

6. DISCLOSURE OF PERSONAL DATA

We may share or disclose Personal Data collected through the Website and Services with third parties, only as necessary for the purposes described in this Privacy Policy and in accordance with applicable law. We do not sell your Personal Data.

The categories of recipients with whom we may share Personal Data include:

- **Service Providers** – We may share Personal Data with our service providers, contractors, and vendors who perform services on our behalf, such as marketing, data storage, hosting, analytics, IT support, and development. These third parties are provided with access to Personal Data only as necessary to perform their services for us and are contractually obligated to protect the confidentiality and security of the information and to use it solely for the purpose of providing their services to XPlace.
- **AllJobs Group** – Subject to applicable law and your consent, we may share Personal Data with the AllJobs Group for the purpose of providing you with services, offering additional opportunities that may be relevant to you, or sending marketing communications on behalf of the AllJobs Group.

The AllJobs Group includes All You Need Ltd. (Company No. 513543652), AllJobs Recruitment Ltd. (Company No. 514487040), AllJobs Match Limited Partnership (Partnership No. 550244529), Jobik S.T. Ltd. (Company No. 516604253), Sahbak Works Ltd. (Company No. 550244529), and any other affiliated or related entity (collectively, the “**AllJobs Group**”).

- **Business Partners** – Subject to applicable law, and with your consent and/or at your request, we may share information with our business partners for the purpose of offering additional services that may interest you, such as lead conversation management services, invoice generation for employees and freelancers, and similar services. If you choose to engage with these business partners, we will receive information regarding the purchased service. It is clarified that after the transfer of Personal Data to business partners following your consent and/or request, the use of information by those business partners will be subject to their own privacy policies, and we will not be responsible for such use. It should be emphasized that we do not collect and do not receive access to information that you provide directly to business partners in the context of using their services.
- **Third-Party Technological Tools** – We may share certain information with third parties through the use of cookies and similar technologies for digital marketing and analytics

purposes (as further detailed in Section 5 of this Privacy Policy). These third parties may collect and use data independently in accordance with their own privacy policies.

- **Corporate Transactions or Organizational Changes** – Subject to applicable law, we may share Personal Data with the AllJobs Group or with a third party in connection with the transfer or assignment of our business (in whole or in part), including mergers, acquisitions, reorganizations, joint ventures, or other similar transactions (including during negotiations of such transactions). In such cases, the recipient of the Personal Data will be required to use the data in accordance with this Privacy Policy and applicable law.
- **Enforcement, Legal Obligations, and Fraud Prevention** – We may disclose Personal Data to enforce our Terms of Use, detect, prevent, or address fraud, security, or technical issues, or as otherwise required to comply with applicable law. We may also share Personal Data to investigate or resolve disputes, respond to legal claims, or comply with lawful requests from competent authorities or court orders.
- **Aggregated or Non-Identifiable Data** – We may use, share, or disclose aggregated or anonymized data that does not identify any individual, for research, analytics, or business purposes, at our discretion.

We take reasonable steps to ensure that any third party receiving Personal Data from us processes it in accordance with this Privacy Policy and applicable data protection laws.

7. DATA SECURITY AND CROSS-BORDER DATA TRANSFER

We implement physical, technical, and administrative safeguards that comply with industry standards and applicable laws to protect Personal Data from unauthorized access, alteration, disclosure, or destruction. These measures include, among others, encryption, firewalls, access controls, and internal policies designed to ensure that only authorized personnel can access Personal Data on a need-to-know basis.

However, no system is entirely secure, and the use of the internet inherently involves risks. While we make every effort to prevent and defend against unauthorized access, we cannot guarantee that such incidents will never occur or that third parties will not circumvent our security measures.

You are solely responsible for maintaining the confidentiality of your account credentials (including username and password) and for all activities performed under your account. If you become aware of or suspect any unauthorized use or disclosure of your credentials, you must notify us immediately at privacy@xplace.co.il.

We may process or store Personal Data both in Israel and in other countries. By using our Services, you acknowledge and agree that your information may be transferred to, stored, and processed on servers operated by us or our service providers outside of Israel, in accordance with applicable data protection laws and appropriate safeguards.

8. THIRD-PARTY LINKS

Our Website may contain links or references to websites operated by third parties, including companies within the AllJobs Group (collectively, “**Linked Websites**”). Please note that any use of such Linked Websites, including the provision of information or registration on those websites, is subject to the privacy practices and policies of those third parties, and not to this Privacy Policy.

We are not responsible for the privacy practices, content, or security of any Linked Websites. We recommend that you carefully review the privacy policy of each third-party website you visit before providing any Personal Data.

9. DATA RETENTION

We retain Personal Data for as long as necessary to fulfill the purposes described in this Privacy Policy, including the provision of our Services, compliance with legal obligations, dispute resolution, and enforcement of our agreements.

In particular, we will retain your Personal Data for as long as your account remains active or as required to provide you with the Services. We may retain certain data for longer periods where necessary to comply with our legal obligations, maintain accurate business records, resolve disputes, or enforce our rights.

10. YOUR RIGHTS REGARDING YOUR PERSONAL DATA

The Israeli law grants you certain rights regarding your Personal Data. Below is an overview of these key rights and how to exercise them, to the extent you are entitled to them:

Your main rights regarding your Personal Data held in our databases include:

- **Right of Access, Correction, and Deletion:** According to the Privacy Protection Law, you may be entitled to access your Personal Data stored in the Company's database(s), and you may also be entitled to request correction of this Personal Data if you find it to be incorrect, incomplete, unclear, or outdated. To submit a request to exercise these rights, to the extent you are entitled to them, you can contact us by completing and signing [the request form for accessing, correcting, or deleting Personal Data](#), and sending it to the email address: privacy@xplace.co.il. To protect your privacy, the Company may require identifying information before processing your request to verify your identity and provide an appropriate response. Our representatives may contact you for additional verification or to clarify details necessary for processing your request. We will inform you of the results of our review and act in accordance with legal requirements.
- **Removal from Direct Mailing Lists:** You have the right to request removal from direct mailing lists (i.e., communications based on specific personal characteristics) in accordance with the Privacy Protection Law, through any communication channel. You are entitled to request in writing the deletion of such Personal Data from databases used for direct mailing by sending a message to the email address: privacy@xplace.co.il.

- **Opt-Out from Marketing Communications** – You may opt out at any time from receiving marketing communications under Section 30A of the Israeli Communications (Telecommunications and Broadcasting) Law, 1982. You can unsubscribe by using the “unsubscribe” option included in our marketing messages. After opting out, you will no longer receive marketing communications, but we may continue to send you service-related messages necessary for the operation of your account. Information required for the management of our business will continue to be stored in accordance with applicable law but will no longer be used for marketing purposes.
- **Managing Cookies and Tracking Technologies:** You can prevent the collection of Personal Data through cookies by adjusting the settings in your browser or device operating system. Changing these settings is your responsibility, and some services may not be available or you may need to re-enter your login details.

11. AGE LIMITATION

Our Website and Services are intended for individuals aged 18 and above. We do not knowingly collect Personal Data from minors under the age of 18. If you are under 18, you must refrain from using the Website or the Services and from providing us with any Personal Data. If we become aware that we have collected Personal Data from a minor, we will take steps to delete it promptly.