

DATA PRIVACY - APPLICANTS AND PARTICIPANTS

LAST UPDATED OCTOBER 2019

1. INTRODUCTION

Onward Israel (“**Onward**” “we” or “us”) has the highest regard for your privacy and the personal information shared with us.

While we care about the privacy of all of our participants and applicants, as an individual from within the European Union, you are entitled to certain specific rights which we illustrate and accommodate for in this Privacy Notice, including your right to understand what kind of information we collect, how we use it and with whom we share such information with.

Onward has created this Privacy Notice to demonstrate our firm commitment to secure and trustworthy internet use and the individual’s right to privacy. This Privacy Notice sets Onward’s privacy policies and practices in relation to information that is collected by as part of your registration process, and other personal data which we may collect within the course of your participation in our programs.

WE STRONGLY URGE YOU TO READ THIS PRIVACY NOTICE AND MAKE SURE THAT YOU FULLY UNDERSTAND AND AGREE TO IT. IF YOU DO NOT AGREE TO THIS NOTICE, PLEASE DISCONTINUE THE ENROLLMENT PROCESS.

○ What is Personal Data?

As between our relations with you in connection with your registration and/or participation in our programs, “**Personal Data**” means any data, which may enable the identification of a specific person, or is otherwise linked to such potentially identifying data.

2. GROUNDS FOR PERSONAL DATA COLLECTION

When you apply to participate in any of our programs, we may require the collection of certain Personal Data for certain purposes. While you are not obligated to provide us with such Personal Data, failure to do so in certain events may prevent you from completing the application or otherwise participate in our programs (*for example, if you refuse to provide us with your full name*).

As for the registration process, information that we ask is required for us to enable your application for and participation in our programs and to fulfill our contract, improve our

services, or otherwise comply with applicable law – as our legitimate interest. Personal Data that we ask under specific fields marked as “optional”, is used for additional purposes, per which we will seek your specific consent without affecting your ability to continue the enrollment process. We may also ask for Personal data ask to Personal Data for the main purpose of fulfilling our legitimate interest- for purposes other than our legitimate interest, and in such event, we will also seek your specific consent, without affecting your ability to continue the enrollment process.

3. FOR WHAT PURPOSES DO WE USE YOUR DATA?

We will use your Personal Data in the scope and manners to which we receive your consent and our legitimate interest.

Our legitimate interest include all actions required for us to fulfill or examine our possibility to fulfill our contract with you, such as examining your application form, facilitating, maintaining, and improving the programs offered to our participants and applicants and their wellbeing, securing contact with our participants (such as for safety and general communication purposes), improving our services and support, and protecting our participants, applicants ourselves and other individuals related to our programs, creating statistical analyzes related to our programs and their participants and applicants, and complying with applicable law.

We may also use Personal Data for maintaining contact with our participants applicants and alumni (during and following the conclusion of our program(s)), distributing notices, news and updates, events, or other activities we believe you may be interested in, or otherwise locating or otherwise offer you with our programs which we think may be more interesting to you.

Accordingly, we use Personal Data in order to contact our users via e-mail with general and/or service-related messages, specifically through the distribution of a newsletter.

- Promotional Communications. We, or our affiliates (if you provide your consent) may also contact you via the email address you provide us with in order to notify you about new programs, services, events and special opportunities or any other information we think you will find valuable, or that you might otherwise be interested.
If you wish not to receive such promotional communications, you may notify us at any time by contacting us or otherwise following the “unsubscribe”, “stop” or “change e-mail preferences” instructions in the promotional communications you receive.
- Further Uses. For the removal of doubt, we may share your Personal Data in additional manners, pursuant to your explicit approval, if we are legally obligated to do so, or if we have successfully rendered such data non-personal and anonymous.

- Non-Personal Data. We may share with our affiliates or otherwise use non-Personal Data in our sole discretion for analytic purposes and without the need for further approval.

4. HOW DO WE COLLECT DATA?

- Your Data Received From You. You may provide us Personal Data voluntarily, during your enrollment process or otherwise within the course of your participation at our programs.
- Data Provided Via Others. We may receive your Personal Data from our Organizers / Affiliates who assist us administering our programs (including in such events where you change programs), whether on an ad-hoc basis or by receiving constant access to their respective databases.
- Others' Data Received From You. Some of the Personal Data we ask you to provide (such as names and contact information for emergency purposes) is not your own, but is crucial for us to enable you to participate in our programs. As such, before providing us this information you must, and shall be solely responsible to, secure the consent of such individuals for providing their information to us.

If you choose to share with us Personal Data marked as voluntary in the Registration Form above or while participating in our program, we will use this information for the purposes mentioned in this Privacy Notice, and may share it with our affiliates.

5. HOW DO WE RETAIN AND STORE YOUR DATA?

Onward is based in a jurisdiction which is considered by the European Commission to be offering an adequate level of protection for the Personal Data of EU Member State residents which Onward shall abide by.

While privacy laws may vary between jurisdictions, Onward has taken reasonable steps to ensure that your Personal Data is treated by its affiliates and business partners in a secure and lawful manner, and in accordance with common industry practices, regardless of any lesser legal requirements that may apply in their jurisdiction.

In general, we retain your Personal Data for a period of 36 months; however, we may inform you via email of extending such period from time to time. Please note that except as required by applicable law, we will not be obligated to retain your data for any particular period, and are free to securely delete it for any reason and at any time, with or without notice to you.

6. WITH WHOM DO WE SHARE DATA?

We may share your data (including Personal Data) with certain third parties, including law enforcement agencies, our business partners and our affiliates – but only in accordance with this Privacy Notice:

- Compliance with Laws, Legal Orders and Authorities. We may disclose or allow government and law enforcement officials access to certain Personal Data, in response to a subpoena, search warrant or court order (or similar requirement), or in compliance with applicable laws and regulations, including for national security purposes. Such disclosure or access may occur with or without notice to you, if we have a good faith belief that we are legally compelled to do so, or that disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing.
- Affiliates / Organizers. Organizers are the companies we employ to carry out the program, providing housing, programming, internship placements, and other similar functions. Affiliates are the partners to the program who provide funding, recruitment and help guide applicants through the application process where applicable. We may share your Personal Data with our organizers and affiliates in accordance with the scope of this Privacy Notice and your additional consent.
- Service Providers and Business Partners. We may engage selected third party companies and individuals to perform services complementary to our own (collectively: “**Service Providers**”). These Service Providers may have access to your Personal Data, depending on each of their specific roles and purposes in facilitating our programs, and may only use it for such purposes. We may, subject to your consent, may share certain Personal Information with our business partners, who are interested in offering you with materials you might find interesting, such as charitable opportunities and fundraising.
- Protecting Rights and Safety. We may share your Personal Data with others, if we believe in good faith that this will help protect the rights, property or personal safety of Onward, any of our users or any members of the general public.
- Related Parties. We may share Personal Data internally within our group of companies, for the purposes described in this Privacy Notice.

A list of the Service Providers / Organizers / Affiliates / Business Partners we currently engage that has access to your Personal Data are: JAFI (Jewish Agency for Israel) and MASA Israel Journey, the Program's local partner and the program's local organizer, which you can learn about in the program specific page at www.onwardisrael.org .

7. SECURITY MEASURES

Onward maintains physical, electronic and procedural safeguards to help guard your Personal Data. We restrict access to Personal Data to those persons who need to know that information to provide products or services to you and any persons you have authorized to have access to such data. While we strive to protect your Personal Data, we cannot guaranty the security of any information you transmit to us.

8. TRANSFER OF PERSONAL DATA BETWEEN THE ONWARD GROUP ENTITIES

We may allow access to your Personal Data for the uses prescribed in this Privacy Notice, internally, between our group entities. In instances where Personal Data is collected from individuals within the EU, we will make sure that transfer outside EU borders (a) an EU Commission Adequacy Decision is in place, or (b) we have a legitimate interest of such transfer, and the recipient entity is bound by similar security measures that we apply.

9. YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION

Please note that you may have certain rights regarding the manner of collection, processing and usage of your personal information pursuant to applicable privacy laws such as the EU General Data Protection Regulations (“**GDPR**”). Under the GDPR (to the extent it applies to you) you may be eligible for the following rights:

- *The right to have your Personal Data deleted, to the extent that, and other than in connection with our compliance with a legal obligation/our exercise of a legal defense.*
- *The right to access the Personal Data collected and processed;*
- *The right to edit the Personal Data collected and processed;*
- *The right to rectify untrue or incorrect Personal Data;*
- *The right to object to us processing your Personal Data. However, in cases you object to our processing of any Personal Data which we require to reasonably provide you with any services and/or otherwise make the Platform available to you, you will not be able to use such services, and your use of the Platform might be limited (in whole or in part);*
- *The right to lodge a formal complaint with the EU supervisory authority, if you believe that any of your rights under the GDPR were breached; and,*
- *The right to have your Personal Data exported at your request, which we will make efforts to comply with within a reasonable period of time, and provide you with such complied data by form of an electronic medium of our choice.*

Please note that the above list contains a summary of the main rights you may have under the GDPR. Under no circumstances shall the above be deemed as an exhaustive list, nor should you rely on it in terms of fully understanding all of your rights under the GDPR.

10. CHILDREN

Our programs are directed towards and designed for use by persons aged 16 and older. We do not solicit or knowingly collect Personal Data from children under the age of 16. If we nevertheless receive Personal Data from an individual who indicates that he or she is, or whom we otherwise have reason to believe is, under the age of 16, we will delete such information from our systems.

11. CHANGES TO THIS PRIVACY NOTICE

This Privacy Notice may change over time as we modify or expand our service. If we decide to change our Privacy Notice, we will prominently let you know of such changes through the communication means you have provided us. Any change to this Privacy Notice in a manner requiring specific consent save for the scope of our legitimate interest will not apply to you without such consent.

12. CONTACTING US

If you have any questions about this Privacy Notice, or in the event that you wish to exercise certain rights you are eligible for with respect to your Personal Data, please contact us via the below online contact details. We welcome your questions and suggestions about our Privacy Notice.

Contact Information:

Onward Israel consists of two companies:

- 1) Internships and Opportunities Ltd., is an Israeli company, with its business address at: 14 Hillel St. Jerusalem Israel. Tel: +972-2-6216368
- 2) Onward Israel USA Inc. is an American based company with its business address at 633 3rd Avenue NY, NY 10019. Tel 1-212-339-6061

For any questions or inquiries please contact us by email: Liad Shahr, Director of Knowledge and Registration, at liadg@onwardisrael.org (kindly state the nature of your inquiry at the subject line of the email).