

Privacy Policy of WorkMotion Software GmbH

The basis of effective data protection is comprehensive information about the collection, processing and use of your data ("data processing"). Therefore, we would like to inform you,

- when or during which actions we process data
- what data we process and for what reasons
- who receives data
- what rights you have because of data processing by us.

This privacy policy only governs the use of personal data on our website www.workmotion.com including sub-pages as well as our platform <https://platform.workmotion.com>. If you leave our website via a link or visit our presence on a social media platform, you also leave the scope of this privacy policy.

The transmission of information to or from this website is secured with TLS encryption.

You can access, print or download this privacy policy permanently and at any time at <https://www.workmotion.com/privacy>.

1. Contact information

The person responsible for data processing within the framework of this website within the meaning of the General Data Protection Regulation (GDPR) is:

WorkMotion Software GmbH

Richard-Ermisch-Str. 7, 10247 Berlin

Legal representatives: Felix Steffens, Karim Zaghloul and Jan-Peter Böckstiegel

privacy@workmotion.com

We have also appointed a data protection officer. You can reach him at: jacobsen@cloverlaw.de, Dr. Jonas Jacobsen.

2. General Information on Data Processing

- 2.1. Scope of Data Processing:** We collect and process various types of information through our website and WorkMotion platforms, necessary to provide and enhance our services. The extent of data processing varies based on the functionalities utilized

by you. While you are not obligated to provide personal data; however, failure to do so may restrict your access to certain functionalities..

2.2. Legal Bases for Data Processing:

- i) **Contract Performance (Art. 6 para. 1 b) GDPR):** Data processing necessary for the execution or preparation of a contract.
- ii) **Legitimate Interest (Art. 6 para. 1 f) GDPR):** Processing based on our legitimate interests, detailed within this policy, unless overridden by your rights and interests.
- iii) **Consent (Art. 6 para. 1 a) GDPR):** Processing based on your explicit consent, which you may withdraw at any time, affecting only future processing.
- iv) **Legal Obligation (Art. 6 para. 1 c) GDPR):** Processing necessary to comply with our legal obligations

2.3. Data Deletion and Storage Duration: Personal data is deleted when it is no longer necessary for the purposes for which it was collected or otherwise processed, unless further retention is required for compliance with a legal obligation or for the establishment, exercise, or defense of legal claims.

2.4. Data Subject Rights: You have rights under the GDPR regarding your personal data, including:

- i) **Right to Information:** Access to your personal data processed by us.
- ii) **Right to Rectification:** Correction of incorrect or incomplete data.
- iii) **Right to Deletion:** Erasure of your data under certain conditions.
- iv) **Right to Restriction:** Limitation of data processing.
- v) **Right to Data Portability:** Receiving your data in a structured format.
- vi) **Right to Object:** Objection to data processing based on legitimate interests.
- vii) **Right to Withdraw Consent:** Where processing is based on consent, you may withdraw it anytime.

To exercise these rights, please contact us using the contact details provided. You also have the right to lodge a complaint with the appropriate data protection authority.

2.5. Data Processing Partners: Data processing is partly carried out by processors, particularly for hosting and analyzing the usage of our website and platforms. These

processors are engaged under strict data protection agreements compliant with Art. 28 (3) GDPR.

- 2.6. International Data Transfers:** Data transfers to third countries outside the EEA are carried out under strict compliance with GDPR, using mechanisms such as Standard Contractual Clauses to ensure data protection.

3. Website Usage and Data Processing

- 3.1. Website Functionality:** To display our website and ensure its functionality, we process certain information automatically when you visit www.workmotion.com. This includes essential data needed to maintain the connection and deliver our website content effectively.

- 3.2. Log Files:** Each time you access our website, our server automatically collects specific data sent by your browser. This data is essential for connecting and navigating our site and includes:

- i) IP address (considered personal data)
- ii) Date and time of your visit
- iii) Volume of data transferred
- iv) Whether the access/request was successful
- v) Referrer URL (the previously visited page)
- vi) Browser type and version
- vii) Operating system use.

This log data is not combined with other personal information about you. We store this data to ensure the functionality of our website and to protect it from attacks. Log

files are deleted after 30 days unless longer retention is required for evidence purposes.

3.3. Cookies

Our Website also uses Cookies. To find out which Cookies are used and why, please see our Cookieguideline in section 5.

4. Platform

4.1. Employer of Record (EOR) (formerly WorkGlobal) and Direct Hiring (formerly WorkDirect)

4.1.1. Personal data of Talents

- 4.1.1.1. Account Creation and Data Processing:** When using our EOR and Direct Hiring services, you as a Talent will be required to create a user account. The creation and use of this account on our platforms necessitate the collection and processing of various types of personal data to facilitate your access to our services and manage

your interactions with us effectively. Depending on the specific services you utilize, we may collect the following data:

- i) Basic Identification Information: Name, date, and place of birth.
- ii) Contact Details: Email address, phone number.
- iii) Content Data: Texts, photographs, videos uploaded during the use of our services.
- iv) Payment Information: Bank account details, payment history to process transactions.
- v) Usage Data: Information on how you use our website and services, including access times and log files.
- vi) Employee Data: Names, addresses, date and place of birth, gender, nationality, details of work permits, salary group, tax classification.
- vii) Application Data: Information provided by candidates such as names, contact details, qualifications, and other relevant job application data.
- viii) Sensitive Data: This includes personal data revealing religious or philosophical beliefs, and health data, which are processed under strict compliance with legal protections and consent requirements.

4.1.1.2. Provision of Equipment for Talents: We offer clients the option to provide their employees (referred to as "Talents" under EOR and Direct Hiring) with necessary work equipment via third-party providers. When utilizing this service:

- i) Data Sharing with Equipment Providers: The necessary personal data of the Talent (name, address, and telephone number) is shared with third-party providers such as Hofy Ltd, to facilitate the delivery and setup of the equipment.
- ii) Third-Party Providers: Unless specified otherwise, the equipment is supplied by Hofy Ltd, located at 5 New Street Square, London, EC4A 3TW, UK. To ensure compliance with GDPR and other data protection laws, we enforce strict Data Processing Agreements (DPAs) with each provider. These agreements mandate adherence to stringent security measures and regular compliance audits to safeguard your data.

4.1.2. Personal Data of Client Personnel

4.1.2.1. Account Creation and Data Processing: When using our EOR and Direct Hiring services, the Client will be required to create a user account. The creation and use of

this account on our platforms may necessitate the collection and processing of various types of personal data to facilitate your access to our services and manage your interactions with us effectively. Depending on the specific services you utilize, we may collect the following data:

- i) **Basic Identification Information:** Name, date, and place of birth.
- ii) **Contact Details:** Email address, phone number.
- iii) **Content Data:** Texts, photographs, videos uploaded during the use of our services.
- iv) **Usage Data:** Information on how you use our website and services, including access times and log files.

4.1.3. **Privacy and Data Protection:**

- i) **Data Handling:** All personal data collected for account creation, service provision, and equipment supply is handled in accordance with our stringent data protection policies and the General Data Protection Regulation (GDPR).
- ii) **Consent and Rights:** Talents and clients have the right to access, correct, and request the deletion of their personal data. Specific details on how to exercise these rights are available in the data rights section of this policy.

4.2. **Contractor Management**

- 4.2.1. **Account Creation and Data Processing:** In the Contractor Management model, WorkMotion acts as a platform provider facilitating the engagement between Clients and independent contractors ("Contractors"). Clients use WorkMotion's platform to

create accounts, manage contracts, invoices, and payments directly. The data collected and processed includes:

- i) **Basic Identification and Contact Information:** Name, contact details, and other identifiers.
- ii) **Contract and Payment Details:** Data necessary for contract management and financial transactions, such as bank account information and payment records, etc.
- iii) **Usage Data:** Information on how services are accessed and utilized, which helps in improving platform functionality.

4.2.2. **Data Collection Purpose and Use:**

- i) **To Facilitate Service Delivery:** Data is used to enable Clients to effectively manage their relationships with Contractors, including payment processing and contract management.
- ii) **Compliance and Operations:** Ensuring compliance with legal requirements and smoothing operational processes.

4.2.3. **Data Sharing and Responsibilities:**

- i) Clients are responsible for the accuracy of the data they provide about themselves and the Contractors they engage. This includes ensuring that they have the right to share this data with WorkMotion for processing.
- ii) As an intermediary, WorkMotion facilitates the connection between Clients and Contractors, as well as between Clients and the licensed payment service provider, Nium. WorkMotion does not engage in the direct provision of payment services but acts to transmit payment instructions from Clients to Nium.
- iii) For U.S.-based Contractor Management engagements, WorkMotion works with an independent third-party compliance provider called CXC to assess the legal classification of such Contractors under applicable U.S. law. WorkMotion

may securely share relevant personal data of the Contractor and the Client with this provider solely for the purpose of performing these assessments.

4.2.4. **Data Security and Retention:**

- i) **Data Security Measures:** WorkMotion employs robust security measures to protect data against unauthorized access, alteration, and loss.
- ii) **Data Retention:** Data is retained as long as necessary to fulfill the purposes outlined, in compliance with legal and regulatory requirements.

4.2.5. **Rights of Data Subjects:** Contractors and Clients, as data subjects, have rights under data protection laws, including the right to access, rectify, or erase their personal data, restrict processing, and object to processing in certain circumstances. Requests to exercise these rights can be made directly through the platform or by contacting our Data Protection Officer.

5. **Cookies**

We use cookies on our website and platform for various purposes. A cookie is a small text file containing information that is transmitted by your browser and stored on your computer. These cookies do not contain any personal data. You can also control the use of cookies in your browser and delete cookies yourself at any time. If the cookies listed below have their own option for deleting or blocking them, this is shown in the respective description. Cookies may be necessary to establish a connection or to improve the use of the website.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website and/or the platform.

The use of technically necessary cookies and the associated data processing is based on our legitimate interest in providing our website. Technically necessary cookies are usually deleted automatically when you close your browser (session cookies), in other cases only after some time (persistent cookies). The storage period of persistent cookies is determined by the provider and can be viewed by you in your browser, for example.

5.1. **Managing and Disabling Cookies:**

Cookies play a significant role in enhancing site functionality and user experience. However, if you prefer to restrict, block, or delete cookies, you can do so through your browser settings.

For mobile devices, you can manage cookie settings through the browser app's settings menu.

Impact of Disabling Cookies: Please note that disabling cookies might affect the functionality and features of our website. Certain services and pages might not perform optimally without cookies. If you disable cookies, you may not be able to access certain parts of our website or use essential features.

5.2. Technical cookies

Technical cookies are used to enable additional functionalities or a more comfortable use of the website, e.g. by saving your country or language settings. Technical cookies are usually deleted automatically when you close your browser (session cookies), but in other cases they are only deleted after a longer period of time (persistent cookies). The storage period can be viewed in your browser.

- 5.2.1. **Google Tag Manager** The Google Tag Manager allows marketers to manage website tags via an interface. However, the Tag Manager itself, which deploys the tags, works without cookies and does not collect any personal data. The Tag Manager merely triggers other tags, which in turn may collect data. For these respective third-party providers, corresponding explanations can be found in this privacy policy. However, the Google Tag Manager does not use this data. If you have set or otherwise made a deactivation of cookies, this will be observed for all tracking tags that were used with the Google Tag Manager, i.e. the tool will not change your cookie settings. Google may ask your permission to share some product data (e.g. your account information) with other Google products to enable certain features, such as making it easier to add new conversion tracking tags for AdWords. Google's developers also review product usage information from time to time in order to further optimise the product. However, Google will never share this type of data with other Google products without your consent. For more information, please see Google's usage policy (<https://www.google.com/intl/de/tagmanager/use-policy.html>) and Google's privacy policy (<https://www.alphabet.com/de-de/datenschutzrechtlicher-hinweis>) for this product.
- 5.2.2. **JSDELIVR** We use the JSDELIVR, Królewska 65a Kraków, 33-332, Poland, content delivery network (<https://www.jsdelivr.com/terms/privacy-policy-jsdelivr-net>) to improve the functionality and performance of our website. These content delivery networks receive your IP address in order to evaluate your location and let you download website content and design assets from the nearest server. Contact: dak@prospectone.io
- 5.2.3. **Google Fonts** This website uses so-called web fonts from Google LLC., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google") to display fonts. When you call up a page, your browser loads the required web fonts into your browser in order to display texts and fonts correctly. To do this, your browser establishes a connection with Google, which tells Google that our web pages have been accessed via your IP address. Google Fonts are used in the interest of a uniform and appealing presentation of our websites. If your browser does not support Google Fonts or Web Fonts, your terminal will use a standard font. You can find more information about

Google Fonts and Google's data protection policy at the following Internet addresses:
<https://fonts.google.com/> <http://www.google.de/policies/privacy>

5.3. Cookies for usage analysis Analysis and tracking cookies are used to record and evaluate your usage behaviour when using our services or visiting our website. In doing so, we learn, for example, how often certain functionalities are used or content is read or whether you came to us via an advertisement placed by us. We use this data to further improve the usability of this website and the attractiveness of the services. The legal basis for data processing is your cookie consent, § 25 (1) TTDSG in conjunction with Art. 6 para. 1 a) GDPR. You can prevent the storage of cookies. In addition to the option of preventing them in the settings of your browser software, the individual cookies usually offer their own option to block or deactivate them. This is then shown below in each case.

5.3.1. Datadog Real User Monitoring We use the Real User Monitoring (RUM) service provided by Datadog, Inc., Herengracht 601, Amsterdam, 1017 CE Netherlands ("Datadog"). We implement Datadog RUM in our frontend applications to collect performance metrics, identify technical issues, and improve the overall user experience of our digital platforms. When you visit our website or use our applications, Datadog RUM automatically collects technical data through JavaScript instrumentation, including page load times, network requests, JavaScript errors, user interactions, browser type, device information, and session data. This information helps us detect and resolve performance issues, optimize application functionality, and enhance service reliability. The data processed through Datadog RUM is pseudonymized and used solely for technical optimization purposes. As a data processor acting on our behalf, Datadog is contractually obliged by us to exercise the same care in processing personal data as we do ourselves and has implemented appropriate technical and organizational security measures to protect your data. Datadog processes the collected data in accordance with our instructions and for the purposes specified in our data processing agreement. For more information about Datadog's privacy practices, please read [Datadog's Privacy Policy](#).

5.3.2. Google Analytics 4 This website uses Google Analytics, a web analytics service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Google collects information about your use of this website (including your IP address) in the USA via a cookie and stores the information. Google analyses the information collected and sends us reports on the usage activities on our website. and provides further services to us for this purpose. The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data. In addition to blocking all cookies through your browser, you can prevent Google from processing your data by downloading and installing the browser plug-in available at the following link: <http://tools.google.com/dlpage/gaoptout?hl=de> As an alternative to the browser plug-in or within browsers on mobile devices, please click on the following link to set an opt-out cookie that will prevent the collection by Google Analytics within this website in the future (this opt-out cookie only works in this browser and only for this domain, if you delete your cookies in this browser, you must click this link again):

Google Analytics deactivate [Here opt-out cookie must be activated in JavaScript]. For more information on Google Analytics, please see Google's privacy policy: support.google.com/analytics/answer/6004245?hl=en.

- 5.3.3. **SalesViewer** On this website, data is collected and stored with the SalesViewer technology of SalesViewer GmbH for marketing, market research and optimization purposes. A javascript-based code is used for this purpose, which serves to collect company-related data and the corresponding use. The data collected with this technology is encrypted using a non-recalculable one-way function (so-called hashing). The data is immediately pseudonymised and is not used to personally identify the visitor to this website. The data stored within the framework of Salesviewer will be deleted as soon as they are no longer required for their intended purpose and no legal storage obligations stand in the way of deletion. You can object to the collection and storage of data at any time with effect for the future by clicking on this link to prevent the collection by SalesViewer within this website in the future. An opt-out cookie for this website will be placed on your device. If you delete your cookies in this browser, you must click this link again. <https://www.salesviewer.com/opt-out>
- 5.3.4. **Appvizer** More information about privacy about Appvizer can be found here: <https://www.appvizer.com/about/privacy-policy> Contact Email Address: contact@appvizer.com Headquarter Location: Rond Point Benjamin Franklin CS 39521-Montpellier, 34960, France.
- 5.3.5. **UserFlow** We use UserFlow, Userflow, Inc., 548 Market St PMB 69598, San Francisco, CA 94104-5401, USA, to provide information to our users and collect information from them through prompts on the platform. For example to collect customer satisfaction scores, as well as to educate users about a particular item, button or feature on the platform. More information about privacy at UserFlow can be found here: <https://userflow.com/policies/privacy> Contact Email Address: privacy@userflow.com.
- 5.3.6. **Kissmetrics** We use Metrics Enterprises code, software and/or services by Metrics Enterprises, 145 Corte Madera Town Ctr #445, Corte Madera, CA 94925, USA to obtain information regarding the activities that users engage in while visiting our website. When a user visits our website, the code contained on the website contacts Metrics Enterprises servers and enables Metrics Enterprises to collect Client User Data. This helps us to evaluate and understand how users are interacting with our website and to modify our website in order to make them more valuable or useful for their users. More information about privacy can be found here: <https://www.kissmetrics.io/privacy/contact> Email Address: privacy@kissmetrics.io and support@kissmetrics.io
- 5.3.7. **Linkedin insight** Our websites also use tracking functions of the LinkedIn network. LinkedIn uses cookies when you visit our websites. Your IP address will be transmitted to LinkedIn in the USA together with information about your use of our websites and the devices used. Your use of our websites and other websites that you visit may be analysed and used as the basis for advertising. If you have a LinkedIn

user account and are logged in, LinkedIn may associate your visit to our website with your account. We have no knowledge of the exact data flows between your browser and LinkedIn. Please refer to LinkedIn's privacy policy and cookie policy for more information: Privacy Policy: <https://www.linkedin.com/legal/privacy-policy> Cookie policy: <https://www.linkedin.com/legal/cookie-policy>

- 5.3.8. **Facebook pixel** We use the remarketing function "Custom Audiences via your website" of Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (hereinafter Facebook). For this purpose, the so-called "Facebook pixel" is integrated on our website. When you visit our website, the Facebook pixel establishes a connection between your browser and the Facebook server and sets a cookie. Facebook thereby receives the information that our website has been visited from your IP address. If you are a Facebook member, Facebook can link this information to your Facebook profile and use it for the targeted display of Facebook Ads. You can object to this linking and display in the privacy settings of your Facebook profile. For detailed information on the collection and use of your data by Facebook and your rights and options in this regard, please refer to Facebook's privacy policy at the URL <https://www.facebook.com/about/privacy/>. If you do not want Facebook to link the collected information with your Facebook profile, you can deactivate this function at any time at the URL https://www.facebook.com/ads/website_custom_audiences/. If you are not a Facebook member, you can also deactivate the data transfer to Facebook at the URL <http://www.youronlinechoices.com/>. Contact the Data Protection officer <https://www.facebook.com/help/contact/540977946302970>
- 5.3.9. **HotJar** This website uses the analysis tool Hotjar from Hotjar Ltd, Dragonara Business Centre, 5th Floor, Dragonara Road, Paceville St Julian's STJ 3141, Malta ("Hotjar"). When visiting the site, in addition to technical master data and cookies, the user's mouse movements in particular are examined to create so-called "heat maps". This information enables us to make the website even faster and more customer-friendly. Personal data is completely hidden in this process and is therefore not collected. If you do not agree with Hotjar's approach, you can adjust the cookie settings of your browser accordingly or deactivate the functions under this link: <https://www.hotjar.com/policies/do-not-track/>. You can find more information on data protection at Hotjar here: <https://www.hotjar.com/legal/policies/privacy> Contact Email Address: dpo@hotjar.com and support@hotjar.com.
- 5.3.10. **DoubleClick** This website uses the service DoubleClick by Google, from the company Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). DoubleClick by Google uses cookies to present you with advertisements that are relevant to you. When you visit our website, a pseudonymous identification number (ID) is assigned to your browser, in the form of cookies, in order to check which advertisements were displayed in your browser and which advertisements were called up. The cookies do not contain any personal information. The use of DoubleClick cookies only enables Google and its partner websites to serve ads based on previous visits to our website or other websites on the Internet. (So-called

retargeting) The information generated by the cookies is transmitted by Google to a server in the USA for evaluation and stored there. A transfer of data by Google to third parties only takes place on the basis of legal regulations or within the framework of commissioned data processing. Under no circumstances will Google combine your data with other data collected by Google. You can obtain further information about Google's data protection policy at the following Internet addresses: <http://www.google.de/policies/privacy/> Contact Email Address: account-withdrawal@google.com

- 5.3.11. **Cloudflare** We use the Cloudflare, [101 Townsend Street San Francisco, CA 94107 United States], content delivery network (<https://www.jsdelivr.com/terms/privacy-policy-jsdelivr-net>) to improve the functionality and performance of our website. These content delivery networks receive your IP address in order to evaluate your location and let you download website content and design assets from the nearest server. Data protection contact email address: privacyquestions@cloudflare.com.
- 5.3.12. **Typeform** We use Typeform, TYPEFORM SL, c/ Pallars 108 (Aticco - Typeform), 08018 – Barcelona (Spain), to send out surveys and collect information. For example to collect feedback about features, information about users who want to be in our talent pool. It only registers your information if you opt to fill the survey/smartform. Here's a link to their privacy policy: <https://www.typeform.com/help/a/security-privacy-standards-at-typeform-9350912237844/> Here is the contact to their Data Protection Officer: dpo@typeform.com.
- 5.3.13. **Sentry** Sentry, Functional Software, Inc. d/b/a Sentry. Our address is Functional Software, Inc., 45 Fremont Street, 8th Floor, San Francisco, CA 94105, allows us to find errors on our platform and helps us to correct these errors. PrivacyPolicycompliance@sentry.io.
- 5.3.14. **Valuecase** We use the sales enablement software Valuecase provided by Valuecase GmbH, Axel-Springer-Platz 3, 20355 Hamburg, Germany ("Valuecase"). We may use Valuecase services in the context of our sales, onboarding and customer success processes to provide you with a personalised digital platform on which you find all relevant materials and information in one central place. For this purpose, we process the personal data that you and/or a third party authorized by you provided to us and that is necessary for the technical provision (e.g., IP address, email address). We may also utilize Valuecase to collect data for analytics purposes when you visit the personalised digital platform we granted you access to. As a data processor acting on our behalf, Valuecase analyzes your use of our personalised digital platform by way of cookies and similar technologies so that we can improve our service to you. Valuecase is contractually obliged by us to exercise the same care in processing personal data as we do ourselves. For more, read Valuecase's privacy policy.
- 5.3.15. **UAB iDenfy - Know Your Business (KYB) process** We use UAB iDenfy, Baršausko street 59, 51423 Kaunas, Lithuania. The data Workmotion gets from iDenfy is the data

submitted by the client on the iDenfy platform and the purpose of collecting this data is to determine the potential client's financial trustworthiness status. We use UAB iDenfy to receive and assess information on our clients before they can use our platform. This happens as follow: Once the client is registered with the WorkMotion platform, we invite the client to submit their information via iDenfy. The client will then receive an e-mail from iDenfy on behalf of WorkMotion to provide the necessary information regarding the above mentioned due diligence. Here is the link to their Privacy Policy <https://www.idenfy.com/privacy-policy/>. Here is the contact information to their Data Protection Officer dpo@idenfy.com.

Status: September 2025