



## Privacy Policy for WebDev Program Website

The Interdisciplinary Center Herzliya Projects Ltd. (“**Mifalot**”, “**we**”) is committed to handling personal data in a fair and transparent way. This Privacy Policy applies to candidates of the WebDev Program (as described below).

Mifalot is offering an innovative WebDev program that re-trains and reskills BA graduates for careers in software development (“**WebDev Program**”). The WebDev Program operates within the academic framework of Mifalot in collaboration with leading Israeli tech companies (“**Partner Company**”), which were founded by the University alumni. Together, we set a goal to integrate the WebDev Program graduates into Partner Companies as junior web developers, by offering an academic curriculum, integrating academics with professional training, and provide a learning environment for successful integration into the tech industry (“**Services**”).

This Privacy Policy describes how Mifalot collects and processes information about users (“**user**”, “**you**”) when such are using our WebDev Program website (the “**Website**”). Other related websites, for example, those operated by divisions, faculties, departments or other units may carry their own privacy policy or provide additional information relating to their activities, which will supersede or supplement this Privacy Policy.

Our Privacy Policy explains:

- What information we collect and why we collect it.
- How we use that information.
- Your rights with regard to the collection of such information.

By using our Website, you agree to this Privacy Policy.

### Collecting Information

Please note that the scope of this Privacy Policy is limited only to information collected by Mifalot through your use of its Website. Some information may be automatically collected, and some is collected when you interact with our Website. The type of information that may be automatically collected is non-personal information, collected on the Website, which includes your session durations, the content you accessed on the Website, the frequency and scope of your use of the Website and information about your computer and internet connection including the operating system you use and browser type.

Information from which you can be personally identified may also be collected (“**Personal Information**”). We collect and use such Personal Information for a range of different purposes according to different legal bases of processing. We will elaborate on the types of Personal Information we collect when you use our Website as well as the legal basis which supports our collection and use of your Personal Information.

### The Type of Personal Information Collected

We may, among other information, collect the following:

- a. **Questionnaire**: If you wish to apply to the WebDev Program, you will be required to fill in a candidate’s questionnaire (“**Questionnaire**”), which will contain, among other information, the following:

- Personal details: full name, email address, mobile number, nationality, I.D number, gender, date of birth, country of birth, place of residence, CV file, LinkedIn profile, language proficiency, etc.
  - Educational background: number of matriculation (bagrut) units in mathematics and in English, specialization in a STEM field in high school, psychometric exam, academic degrees, certification as practical engineer, online courses taken, etc.
  - Programming experience: programming experience, programming background, GitHub profile, programming languages, employment background and current status, future business plans, etc.
  - Program requirement: commitment to the WebDev Program, etc.
  - Diversity: as diversity is important for us, we would like to know if you belong to one of the diversity groups from the drop-down menu.
- b. Scholarship Application Form: If you are interested in applying for a scholarship and you assume that based on your personal data you are eligible for a scholarship, you will be required to fill out a scholarship application form and attach additional documents through which we will collect the following information:
- Personal details: such as full name, email address, home address and phone number.
  - Socioeconomic status: such as the marital status of your parents, the number of minor siblings under the age of 21 in your household, salary income, salary slips of each of your parents, residence status (rental or ownership), possession of a vehicle, etc.
  - Supplementary documents: such as current account, an unemployed certificate, parents pay slips, etc.
- c. Contact Form: If you wish to contact us regarding the WebDev Program, whether it's for application purposes, or for business cooperation, we will collect your full name, mobile number, email address, education (candidate), name of the company and position (business cooperation) and the content you submitted to facilitate your inquiry.
- d. Anonymized Information: To the extent permitted by law, we may combine some information we collect with other information we collect from you, other businesses and our business partners. Such collection of information shall be conducted anonymously and shall be aggregated in a manner in which it no longer identifies or references an individual user including by using hashing. We may also share aggregated information and other anonymized information for improving our Services by offering advanced academic programs and future opportunities that may be relevant to you.

### **The Purposes for which your Personal Information is processed**

#### 1. Performance of a contract with you

If you are a WebDev Program candidate, or user, your Personal Information is required for the following activities, which are necessary for the performance of our contract with you or in order to take steps prior to entering into a contract that will formulate your status as a WebDev student.

We will process your Personal Information to:

- Receive, administer and assess your application based on the Questionnaire submitted by you, including inviting you to assessment and orientation days and for consideration of your “good standing” for the WebDev Program.
- Management and administration of your application and registration.
- Examining your eligibility for a scholarship
- Correspond with you in relation to your inquiries through the contact form or application.

Upon applying to the WebDev Program, or contacting us through the contact form, we will process your Personal Information for the performance of a contract with you in which Mifalot will provide you Mifalot’s Services.

## 2. Mifalot’s legitimate interest

Whether you are a candidate or a Partner Company representative, we also need to process your data in light of our legitimate interests or the legitimate interests of others in providing specific services, improving it and keeping it secure. Examples include, but are not limited to, the following:

### Providing you with information that you may find an interest in;

- We will send you direct mailing relating to benefits and opportunities offered by or through us.
- We will send you information regarding Mifalot’s activities and events organized for applicants in relation to future opportunities.

### Improving and developing Mifalot’s Services and Website;

- Improve and develop our Services and understand feedback on Mifalot's Website and to help provide you with more information on Mifalot.
- Conduct an ongoing review and improvement of the information provided on our Website to ensure it is user friendly.
- Improve the management and administration of Mifalot and maintain compliancy with our internal policies and procedures.
- Conduct surveys and research, test features in development, and analyze the information we have to evaluate and improve our Website.

### Maintain a secured environment;

- Verify and authenticate your identity and prevent unauthorized or illegal activity.
- Enhance the safety and security of our Website and Mifalot facilities.
- Conduct security investigations and risk assessments.
- Prevent or take action against activities that are, or may be, in breach of our Terms of Use or applicable law.

## 3. Where We Have Your Consent;

There may be situations where we ask for your consent to process your data e.g. where we ask you to volunteer information about yourself by filling out the Questionnaire, or where we ask for your permission to share sensitive information.

#### 4. Comply with Applicable Laws:

We may process your information if we have a good-faith belief that access, use, preservation, or disclosure of the information is reasonably necessary for Mifalot to comply with a legal obligation and any applicable law. This may include:

- Meeting any applicable law, regulation, legal process, or governmental request.
- Enforcing our Terms of Use, including investigation of potential violations.
- Detecting, preventing, or otherwise addressing fraud, security, or technical issues.
- Protecting against harm to the rights, property or safety of Mifalot, our users, or the public as required or permitted by any applicable law.

#### **Disclosure of Information and Transfer of Data**

Except as otherwise provided in this Privacy Policy, we reasonably attempt to ensure that we never intentionally disclose any of your Personal Information, to any third party without having received your permission, except as provided for herein or otherwise as permitted or required under law.

In order to perform our contractual and other legal responsibilities or purposes, we may, from time to time, need to share your Personal Information with third parties. For instance, we may share your Personal Information with our Partner Companies, including, but not limited to, information that appears on the Questionnaire and details about your performance in the WebDev Program. We may as well share your Personal Information with our affiliates, subsidiaries or any third party service providers and individuals to facilitate our Services or any portion thereof, such as marketing, data management or maintenance services. In particular, pursuant to the Protection of Privacy Regulations (Conditions of Holding and Storing Data and Procedures for Transferring Data Among Public Entities) - 1986, Mifalot shares your information with the Council of Higher Education pursuant to its vested authorities and as provided by law.

We may also share your information with analytics service providers for analytics services. Such analytics service providers set their own cookies or other identifiers on your computer, through which they can collect information about your usage of our Website. This helps us compile aggregated statistics about the effectiveness of our Website.

The above mentioned third parties may be located in countries other than your own, and we may send them information we receive. When such third party service providers process your Personal Information on our behalf, we will assure that they comply with obligations similar to those which are set forth in this Privacy Policy. We will also assure that they will abide by our data privacy and security requirements, and will be allowed to use the Personal Information solely for the purposes we set. We will transfer your Personal Information while using appropriate and suitable safeguards, while using a variety of legal mechanisms, including contracts, to ensure your rights and protections travel with your data.

We may also transfer your information, including Personal Information, in connection with a corporate merger, consolidation, the sale of related assets or corporate division or other fundamental corporate changes. Furthermore, information about you may also be released in order to comply with any valid legal obligation or inquiry or process such as a search warrant, subpoena, statute or court order. We will also release specific information in special cases, such as if you use the Website to perform an unlawful act or omission or take any act or omission that may damage Mifalot, its property and goodwill, or if there is an attempted breach of the security of the Website or a physical or property threat to you or others. The authority supervising such activities is the Israeli Privacy Protection Authority, and you have the right to file a complaint to it or any other relevant supervisory authority.

## **Your Rights**

You have the right at any time to request to access and modify your information. To exercise these options, please contact us at [webdev@idc.ac.il](mailto:webdev@idc.ac.il).

In some jurisdictions, in particular those located within the European Union (the "EU") or within the European Economic Area (the "EEA"), you may be afforded specific rights regarding your Personal Information. Subject to such eligibility, you may have the following rights to:

1. Request a rectification of your Personal Information where the information we hold about you is incorrect or incomplete.
2. Object to the processing of your Personal Information for direct marketing purposes.
3. Object to the processing of your Personal Information where our legal basis for that processing is that such processing is necessary for our legitimate interests.
4. Object to an automated decision-making (including profiling) in certain circumstances.
5. Request the erasure of your Personal Information in certain circumstances, such as where processing is no longer necessary for the purpose it was originally collected for, and there is no compelling reason for us to continue to process or store it;
6. Receive your Personal Information, or ask us to transfer it to another organization that you have provided to us, which we process by automated means, where our processing is either based on your consent or is necessary for the performance of a contract with you.

Generally, with regard to information collected on our Website, Mifalot is a "Data Controller" or a Database Owner. Therefore, if you wish to exercise the above mentioned rights, please contact us, and we will make our best efforts to fulfill your request.

If you wish to file a request regarding any of the above, you may contact us at: [webdev@idc.ac.il](mailto:webdev@idc.ac.il).

## **Cookies**

We may use "cookies" and/or other technologies or files (collectively, "cookies") to identify how visitors make use of this Website. This aggregated tracking information may be used to help us improve and enhance the Website experience for all of our visitors. In addition, cookies are used for adjusting the Website to your personal preferences. Cookies contain information such as the pages you visited, the length of time you stayed on the Website, the location from which you accessed the Website and more. If you would prefer not to have cookies stored on your computer, you may modify your browser settings to reject most cookies, or manually remove cookies that have been placed on your computer. However, by rejecting the cookies, you may be unable to fully access the offerings on this Website. To find out more about cookies, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **Opt In or Opt Out**

You are always in control of your data, and if you choose to receive information from us, you can change your mind later. If, at any time, you would like to stop receiving such information or opt out of a feature, you may notify us by writing to [webdev@idc.ac.il](mailto:webdev@idc.ac.il). You should be aware, however, that it is not always possible to completely remove or modify information in our databases and servers, although we will always make reasonable efforts to do so upon your request.

## **Links to Other Websites**

This Website may provide links to other websites. Please be aware that these other websites are not covered by our Privacy Policy. This Privacy Policy does not cover the information practices

exercised by other providers of products or services, advertisers or other websites, companies or individuals, which are not owned or controlled by Mifalot. We suggest that when linking to another website, you always read that website's privacy policy before volunteering any personally identifiable information.

### **Data Security**

We deploy industry standard, or better measures to ensure the security, confidentiality, integrity and availability of personal data we process. We maintain physical, technical and administrative safeguards, and test and update these periodically. We endeavor to restrict access to Personal Information on a 'need to know' basis for the provision of Services to you. In the event of a security breach, we will take all reasonable action to minimize any harm. Although we will do our best to protect Personal Information, we cannot guarantee the security of data transmitted to our site or to group companies, and transmission is at the users own risk.

### **Data Retention**

Generally, Mifalot does not retain information longer than necessary and for its reasonable business and lawful needs. If you withdraw your consent to us processing your data, we will erase your Personal Information from our systems, unless the data is required for Mifalot to establish, exercise or defend against legal claims or it is necessary for the performance of the requested Services.

### **Children's Privacy**

The Website is not intended for children under the age of 16. We do not, knowingly or intentionally, collect information about children who are under 16 years of age.

**IF YOU ARE UNDER THE AGE OF 16 YOU MAY NOT USE THE WEBSITE, UNLESS PARENTAL CONSENT IS PROVIDED ACCORDINGLY**

### **Questions Regarding Our Privacy Policy**

If you have any questions regarding this Privacy Policy or the practices described above, you are always welcome to contact us at [webdev@idc.ac.il](mailto:webdev@idc.ac.il).

### **Revisions and Modifications to our Privacy Policy**

We reserve the right to revise, amend, or modify this Privacy Policy at any time. When changing the policy, we will update this posting accordingly. Please review this Privacy Policy often so that you will remain updated regarding our current policies.

### **Governing Law and Jurisdiction**

This Privacy Policy will be governed and interpreted pursuant to the laws of the State of Israel without giving effect to its choice of law rules. You expressly agree that the exclusive jurisdiction for any claim or action arising out of or relating to this Privacy Policy shall be to the competent courts in Tel Aviv, Israel, to the exclusion of any other jurisdiction.

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