**PRIVACY POLICY**

Effective from July 15, 2021

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. We want to empower you to make the best decisions about the information that you share with us. That’s the purpose of this Privacy Policy.

You should read this policy in full, but here are a few key things we hope you take away from it:

– Talentli is an open system and your personal information is viewable and searchable by authorized recruiters from leading local and international companies. We give you private ways to communicate on Talentli too, through protected Private Messages.

– When you use Talentli, we receive some additional information from you like the type of device you’re using and your IP address. We use this information to keep your Account secure. We also give you control over your Account security, through protected Account Settings.

– You cannot use Talentli under a pseudonym if you prefer not to use your name.

– You can always download information you have shared on Talentli.

If you have questions about this policy, how we collect or process your personal data, or anything else related to our privacy practices, we want to hear from you. You can contact us at any time.

**1 Information You Share on Talentli**

We require certain information to provide our Services to you. For example, you must have an Account in order to share information on Talentli. When you choose to share the information described below, we collect and use it to operate our Services.

**1.1 Basic Account Information**

You do not have to create an Account to use some of our service features, such as searching and viewing public profiles. If you do choose to create an Account, you must provide us with some personal data so that we can provide our Services to you. On Talentli, this includes your name (for example, “Nurzhan Berkimbayev”), a username (for example, “@nurzhanberkimbayev”), and an email address or phone number. Your name and username are always public, and you cannot use a pseudonym. You cannot create and manage multiple Accounts, for example to express different parts of your identity.

**1.2 Contact Information**

We use your contact information, such as your email address or phone number:

1 to authenticate your Account,

2 to keep your Account – and our Services – secure,

3 to help prevent spam, fraud, and abuse,

4 to send you information about our Services.

If you provide us with your phone number, you agree to receive text messages from Talentli to that number as your country’s laws allow. You can use your Account Settings to control notifications you receive from Talentli. You can also unsubscribe from any notifications.

If you email us, we will keep the content of your message and your email address to respond to your request.

**1.3 Profile Information**

Your profile information is open to others (individuals or organizations) inside the Talentli system but closed to the external world. You are responsible for the information you share on Talentli, and you should think carefully about what you share, especially if it is sensitive information.

**1.4 Payment Information**

We do not require you to provide any payment information, including your credit or debit card number, card expiration date, CVV code, and billing address, in order to purchase any offerings provided as part of our Services.

**1.5 Private Messages and Non-Public Communications**

You can use Private Messages to have non-public communications on Talentli.

When you communicate with others by sending or receiving Private Messages, we will store and process your communications and information related to them. This includes link scanning for malicious content, detection of spam, abuse and prohibited images, and use of reported issues. We also use information about whom you have communicated with and when (but not the content of those communications) to better understand the use of our Services, to protect the safety and integrity of the Talentli system.

When you use Private Messages to communicate, remember that recipients have their own copy of your communications – even if you delete your copy of those communications from your Account – which they may duplicate, store, or re-share.

**1.6 How to Control Information You Share on Talentli**

Your Account Settings let you decide:

– Whether you want to block or mute other accounts (individuals or organizations);

– Whether organizations can add you to their TalentBank;

– Whether organizations can send you private messages;

– Whether others can find you based on your email or phone number.

**2 Additional Information We Receive**

We receive additional information when you use our Services. Like the information you choose to share on Talentli, we use the information described below to operate our Services.

**2.1 Log Data**

We receive information when you view content on or otherwise interact with our Services, which we refer to as Log Data, even if you have not created an Account. For example, when you visit our website or interact with our email notifications.

This Log Data includes information such as the referring web page, pages visited, your IP address, browser type, operating system, device information, location information, and cookie information. We also receive Log Data when you click on, view, or interact with hyperlinks across our Services. We use Log Data to operate our Services and ensure their secure, reliable, and robust performance.

**2.2 Location Information**

We require information about your location, which we get from signals such as your IP address, to securely and reliably set up and maintain your Account and to provide our Services to you. We may collect, use, and store additional information about your location – such as places where you’ve previously used Talentli – to operate our Services.

**2.3 Cookie Information**

A cookie is a small piece of data that is stored on your computer or mobile device. Cookies are not required for many parts of our Services. However, some of our Services – such as Account security – may not function properly if you disable cookies. When your browser or device allows them, we use both session cookies and persistent cookies to operate our Services, to better understand how you interact with our Services, and to monitor aggregate usage patterns.

You can learn more about how we use cookies and similar technologies here.

**2.4 Personalization**

When you enter Talentli on a browser or device, we associate that browser or device with your Account for purposes such as authentication and security. We do this to securely operate our Services.

**2.5 Hyperlinks**

In order to operate our Services, we keep track of how you interact with hyperlinks across our Services. If you click on an external hyperlink on Talentli, that website operator might figure out that you came from Talentli. They may also collect other personal data from you, such as cookie identifiers or your IP address.

**2.6 Third Parties and Affiliates**

We may receive information about you from third parties who are not our partners, such as our corporate affiliates or partners who help us evaluate the safety and quality of content across our Services.

You may choose to connect your Talentli Account to an Account on another service, and that other service may send us information about your Account on that service. We use the information we receive to provide you features like cross-service authentication. For integrations that Talentli formally supports, you may revoke this permission at any time from your Account Settings. For other integrations, please visit the service you have connected to Talentli.

**3 Information We Share and Disclose**

Talentli is designed to broadly and instantly disseminate information you share through our Services. In the limited circumstances where we disclose your private personal data, we do so subject to your control, because it’s important for operating our Services or because it’s required by law.

**3.1 Sharing You Control**

We may share or disclose your personal data only with your consent or at your direction.

**3.2 Service Providers**

We engage service providers to perform functions and provide services for us in different countries. For example, we use a variety of third-party services to help operate our Services, such as website hosting services. We may share your private personal data with such service providers subject to obligations consistent with this Privacy Policy and any other appropriate confidentiality and security measures, and on the condition that the third parties use your private personal data only on our behalf and pursuant to our instructions.

**3.4 Affiliates and Change of Ownership**

In the event that we are involved in a bankruptcy, merger, acquisition, reorganization, or sale of assets, your personal data may be sold or transferred as part of that transaction. This Privacy Policy will apply to your personal data as transferred to the new entity. We may also disclose personal data about you to our corporate affiliates in order to help operate our Services and our affiliates’ Services.

**3.3 Law, Harm, and the Public Interest**

Notwithstanding anything to the contrary in this Privacy Policy or controls we may otherwise offer to you, we may preserve, use, share, or disclose your personal data or other safety data if we believe that it is reasonably necessary:

1 to comply with a law, regulation, legal process, or governmental request;

2 to protect the safety of any person;

3 to protect the safety or integrity of our platform (e.g. to help prevent spam, abuse, or malicious actors on our Services, to explain why we have removed information or Accounts from our Services);

4 to address fraud, security, or technical issues; or

5 to protect our rights or property or the rights or property of those who use our Services.

However, nothing in this Privacy Policy is intended to limit any legal defenses or objections that you may have to a third party’s, including a government’s, request to disclose your personal data.

**3.5 Non-Personal Information**

We may use non-personal data – such as aggregated information, demographics, the number of people who clicked on a particular link, and some inferred interests – to produce and publish various reports, including Industry Reports and Career Insights.

**4 Managing Your Personal Information on Talentli**

You control the personal data you share on Talentli. You can access or rectify this data at any time. You can also deactivate your Account. We provide you tools to object, restrict, or withdraw consent where applicable for the use of data you have provided to Talentli. And we provide easy ways for you to contact us.

Please note, to help protect your privacy and maintain security, we take steps to verify your identity before granting you access to your personal information or complying with deletion or other related requests.

**4.1 Object, Restrict, or Withdraw Consent**

When you are logged into your Account, you can manage your Privacy Settings at any time. It may take a short amount of time for Privacy Settings to be fully reflected throughout our Services.

**4.2 Accessing or Rectifying Your Personal Data**

If you have registered an Account on Talentli, we provide you with tools and Account Settings to access, correct, modify or delete the personal information you provided to us and associated with your Account. To submit a request related to access, correction, modification or deletion of your personal information, you may also contact us as specified in section 9 of this Privacy Policy.

**4.3 Deleting Your Personal Data**

You can always deactivate your Account. When deactivated, your Account, including your name, username, and profile, will no longer be viewable throughout our Services. For up to 30 days after deactivation it is still possible to restore your Account if it was accidentally or wrongfully deactivated.

Keep in mind that search engines and other third parties may still retain copies of your public information, like your profile information, even after you have deleted the information from our Services or deactivated your Account. Learn more here.

We keep Log Data for a maximum of 12 months.

**5 Advertising and Our Services**

There is no advertising on Talentli. And will never be. We prohibit anyone to advertise anything throughout our Services.

**6 Children and Our Services**

Our Services are not directed to children, and you may not use our Services if you are under the age of 16. You must also be old enough to consent to the processing of your personal data in your country (in some countries we may allow your parent or guardian to do so on your behalf).

**7 Our Global Operations**

To bring you our Services, we operate globally. Where the laws of your country allow you to do so, you authorize us to transfer, store, and use your data in any country where we operate. In some of the countries to which we transfer personal data, the privacy and data protection laws and rules regarding when government authorities may access data may vary from those of your country.

**8 Changes to This Privacy Policy**

We may revise this Privacy Policy from time to time. The most current version of this Privacy Policy will govern our processing of your personal data and will always be at https://tlnt.li/legal/privacy

If we make a change to this Privacy Policy that, in our sole discretion, is material, we will notify you within https://tlnt.li or by sending an email to the email address associated with your Account. By continuing to access or use the Services after those changes become effective, you agree to be bound by the revised Privacy Policy. After all, you can always change your Privacy Settings. The power is yours to choose what you share with the world.

**9 Additional Information or Assistance**

Thoughts or questions about this Privacy Policy? Please let us know by contacting us at legal@tlnt.li