

Your Privacy Matters

Fryends's mission is to connect the world's professionals to allow them to be more productive and successful. Central to this mission is our commitment to be transparent about the data we collect about you, how it is used and with whom it is shared.

This Privacy Policy applies when you use our Services (described below). We offer our users choices about the data we collect, use and share as described in this Privacy Policy, Cookie Policy.

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Introduction

We are a social network and online platform for small businesses, soleprenuers, freelancers and professionals. People use our Services to find and be found for business opportunities and to connect with others and information. Our Privacy Policy applies to any Member or Visitor to our Services.

Our registered users (“Members”) share their professional identities, engage with their network, exchange knowledge and professional insights, post and view relevant content, learn and find business and career opportunities. Content and data on some of our Services is viewable to non-members (“Visitors”).

We use the term “Designated Countries” to refer to countries in the European Union (EU), European Economic Area (EEA), and Switzerland.

Services

This Privacy Policy, including our Cookie Policy applies to your use of our Services.

This Privacy Policy applies to Fryends.com, Fryends-branded apps, communications and services (“Services”), including off-site Services, such as our ad services but excluding services that state that they are offered under a different privacy policy.

Data Controllers and Contracting Parties

Mbakop LLC will be the controller of your personal data provided to, or collected by or for, or processed in connection with, our Services; you are entering into the User Agreement with Mbakop LLC.

As a Visitor or Member of our Services, the collection, use and sharing of your personal data is subject to this Privacy Policy (which includes our Cookie Policy and other documents referenced in this Privacy Policy) and updates.

Change

Changes to the Privacy Policy apply to your use of our Services after the “effective date.”

Fryends (“we” or “us”) can modify this Privacy Policy, and if we make material changes to it, we will provide notice through our Services, or by other means, to provide you the opportunity to review the changes before they become effective. If you object to any changes, you may close your account.

You acknowledge that your continued use of our Services after we publish or send a notice about our changes to this Privacy Policy means that the collection, use and sharing of your personal data is subject to the updated Privacy Policy.

1. Data We Collect

1.1 Data You Provide To Us

You provide data to create an account with us.

Registration

To create an account you need to provide data including your name, email address and/or mobile number, and a password. If you register for a premium Service, you will need to provide payment (e.g., credit card) and billing information.

You create your Fryends profile (a complete profile helps you get the most from our Services).

Profile

You have [choices](#) about the information on your profile, such as your education, work experience, skills, photo, [city or area](#) and endorsements. Some Members may choose to complete a separate [ProFinder profile](#). You don't have to provide additional information on your profile; however, profile information helps you to get more from our Services, including helping recruiters and business opportunities find you. It's your choice whether to include [sensitive information](#) on your profile and to make that sensitive information public. Please do not post or add personal data to your profile that you would not want to be publicly available.

You give other data to us, such as by syncing your address book or calendar.

Posting and Uploading

We collect personal data from you when you provide, post or upload it to our Services, such as when you fill out a form, (e.g., with demographic data or [salary](#)), respond to a survey, or submit a resume. If you opt to import your address book, we receive your contacts (including contact information your service provider(s) or app automatically added to your address book when you communicated with addresses or numbers not already in your list).

If you sync your contacts or calendars with our Services, we will collect your address book and calendar meeting information to keep growing your network by suggesting connections for you and others, and by providing information about them, e.g. times, places, attendees and contacts.

You don't have to post or upload personal data; though if you don't, it may limit your ability to grow and engage with your network over our Services.

1.2 Data From Others

Others may post or write about you.

Content and News

You and others may post content that includes information about you (as part of articles, posts, comments, videos) on our Services. Unless you opt-out, we collect public information about you, such as professional-related news and accomplishments (e.g., patents granted, professional recognition, conference speakers, projects, etc.) and make it available as part of our Services (e.g. suggestions for your profile, or notifications of mentions in the news).

Others may sync their contacts or calendar with our Services.

Contact and Calendar Information

We receive personal data (including contact information) about you when others import or sync their contacts or calendar with our Services, associate their contacts with Member profiles, or send messages using our Services (including invites or connection requests). If you or others opt-in to sync email accounts with our Services, we will also collect “email header” information that we can associate with Member profiles.

Customers and partners may provide data to us.

Partners

We receive personal data about you when you use the services of our customers and partners, such as employers, prospective employers and applicant tracking systems providing us job application data.

Related Companies and Other Services

We receive data about you when you use some of the other services provided by us or our affiliates, including Microsoft. For example, you may choose to send information about your contacts in Microsoft apps and services, such as Outlook, to us for improved professional networking activities on our Services.

1.3 Service Use

We log your visits and use of our Services, including mobile apps.

We log usage data when you visit or otherwise use our Services, including our sites, app and platform technology (e.g., our off-site plugins), such as when you view or click on content (e.g., ads) (on or off our sites and apps), perform a search, install or update one of our mobile apps, share articles or apply for jobs. We use log-ins, cookies, device information and internet protocol (“IP”) addresses to identify you and log your use.

1.4 Cookies, Web Beacons and Other Similar Technologies

We collect data through cookies and similar technologies.

As further described in our Cookie Policy, we use cookies and similar technologies (e.g., web beacons, pixels, ad tags and device identifiers) to recognize you and/or your device(s) on, off and across different Services and devices. We also allow some others to use cookies as described in our Cookie Policy. You can control cookies through your browser settings and other tools. You can also opt-out from our use of cookies and similar technologies that track your behavior on the sites of others for third party advertising.

1.5 Your Device and Location

We receive data from your devices and networks, including location data.

When you visit or leave our Services (including our plugins or cookies or similar technology on the sites of others), we receive the URL of both the site you came from and the one you go to next. We also get information about your IP address, proxy server, operating system, web browser and add-ons, device identifier and features, and/or ISP or your mobile carrier. If you use our Services from a mobile device, that

device will send us data about your location based on your phone settings. We will ask you to opt-in before we use GPS or other tools to identify your precise location.

1.6 Messages

If you communicate through our Services, we learn about that.

We collect information about you when you send, receive, or engage with messages in connection with our Services. For example, if you get a Fryends connection request, we track whether you have acted on it and will send you reminders.

1.7 Omitted

1.8 Sites and Services of Others

We get data when you visit sites that include our plugins, ads or cookies or log-in to others' services with your Fryends account.

We receive information about your visits and interaction with services provided by others when you log-in with Fryends or visit others' services that include our plugins (such as "Share on Fryends" or "Apply with Fryends"), ads, cookies or similar technologies.

1.9 Other

We are improving our Services, which means we get new data and create new ways to use data.

Our Services are dynamic, and we often introduce new features, which may require the collection of new information. If we collect materially different personal data or materially change how we use your data, we will notify you and may also modify this Privacy Policy.

2. How We Use Your Data

We use your data to provide, support, personalize and develop our Services.

How we use your personal data will depend on which Services you use, how you use those Services and the choices you make in your settings. We use the data that we have about you to provide and personalize, including with the help of automated systems and inferences we make, our Services (including ads) so that they can be more relevant and useful to you and others.

2.1 Services

Our Services help you connect with others, find and be found for work and business opportunities, stay informed, get training and be more productive.

We use your data to authorize access to our Services.

Stay Connected

Our Services allow you to stay in touch and up to date with colleagues, partners, clients, and other professional contacts. To do so, you will “connect” with the professionals who you choose, and who also wish to “connect” with you. Subject to your settings, when you connect with other Members, you will be able to search each others’ connections in order to exchange professional opportunities.

We will use data about you (such as your profile, profiles you have viewed or data provided through address book uploads or partner integrations) to help others find your profile, suggest connections for you and others (e.g. Members who share your contacts or job experiences) and enable you to invite others to become a Member and connect with you. You can also opt-in to allow us to use your precise location or proximity to others for certain tasks (e.g. to suggest other nearby Members for you to connect with, calculate the commute to a new job, or notify your connections that you are at a professional event).

It is your choice whether to invite someone to our Services, send a connection request, or allow another Member to become your connection. When you invite someone to connect with you, your invitation will include your name, photo, network and contact information. We will send invitation reminders to the person you invited. You can choose whether or not to share your own list of connections with your connections.

Visitors have choices about how we use their data.

Stay Informed

Our Services allow you to stay informed about news, events and ideas regarding professional topics you care about, and from professionals you respect. Our Services also allow you to improve your professional skills, or learn new ones. We use the data we have about you (e.g., data you provide, data we collect from your engagement with our Services and inferences we make from the data we have about you), to recommend relevant content and conversations on our Services, suggest skills you may have to add to your profile and skills that you might need to pursue your next opportunity. So, if you

let us know that you are interested in a new skill (e.g., by watching a learning video), we will use this information to personalize content in your feed, suggest that you follow certain members on our site, or watch related learning content to help you towards that new skill. We use your content, activity and other data, including your name and picture, to provide notices to your network and others. For example, subject to your settings, we may notify others that you have updated your profile, posted a blog, took a social action, made new connections or were mentioned in the news.

Career

Our Services allow you to explore careers, evaluate educational opportunities, and seek out, and be found for, career opportunities. Your profile can be found by those looking to hire (for a job or a specific task) or be hired by you. We will use your data to recommend jobs or mentees, show you and others who work at a company, in an industry, function or location or have certain skills and connections. We will use your data to recommend jobs to you. We may use automated systems to profile and provide recommendations to help make our Services more relevant to our Members, Visitors and customers. Keeping your profile accurate and up-to-date may help you better connect to others and to opportunities through our Services.

Productivity

Our Services allow you to collaborate with colleagues, search for potential clients, customers, partners and others to do business with. Our Services allow you to communicate with other Members and schedule and prepare meetings with them. If your settings allow, we scan messages to provide “bots” or similar tools that facilitate tasks such as scheduling meetings, drafting responses, summarizing messages or recommending next steps.

2.2 Premium Services

Our premium Services allow paying users to search for and contact Members through our Services, such as searching for and contacting job leads and co-workers, manage portfolio and promote content through social media.

We sell premium Services that provide our customers and subscribers customized-search functionality and tools (including messaging and activity alerts) as part of our talent, marketing and sales solutions. Customers can export limited information from your profile, such as name, headline, current company, current title, and general location (e.g., Dublin), in order to manage sales leads or talent, unless you opt-out. We do not provide contact information to customers as part of these premium Services without your consent. A premium Services customer can store information he/she has about you in our premium Services, such as a resume or contact information or sales history. The data provided about you by these customers is subject to the policies of those customers.

2.3 Communications

We contact you and enable communications between Members. We offer settings to control what messages you receive and how often you receive some types of messages.

We will contact you through email, mobile phone, notices posted on our websites or apps, messages to your Friends inbox, and other ways through our Services, including text messages and push notifications. We will send you messages about the availability of our Services, security, or other service-related issues. We also send messages about how to use the Services, network updates, reminders, job suggestions and promotional messages from us and our partners. You may change your communication preferences at any time. Please be aware that you cannot opt-out of receiving service messages from us, including security and legal notices.

We also enable communications between you and others through our Services, including for example invitations and messages between connections.

2.4 Advertising

We serve you tailored ads both on and off our Services. We offer you choices regarding personalized ads, but you cannot opt-out of seeing other ads.

We target (and measure the performance of) ads to Members, Visitors and others both on and off our Services directly or through a variety of partners, using the following data, whether separately or combined:

- Data from advertising technologies on and off our Services, like web beacons, pixels, ad tags, cookies, and device identifiers;
- Member-provided information (e.g., profile, contact information, title and industry);
- Data from your use of our Services (e.g., search history, feed, content you read, who you follow or is following you, connections, groups participation, page visits, clicking on an ad, etc.), including as described in Section 1.3;
- Information from advertising partners and publishers [[Learn More](#)]; and
- Information inferred from data described above (e.g., using job titles from a profile to infer industry, seniority, and compensation bracket; using graduation dates to infer age or using first names or pronoun usage to infer gender).

We will show you ads called sponsored content which look similar to non-sponsored content, except that they are labeled “ads” or “sponsored.” If you take an action (such as like, comment or share) on these ads, your action is associated with your name and viewable by others, including the advertiser. Subject to your settings, if you take a social action on the Fryends Services, that action may be mentioned with related ads.

Ad Choices

We adhere to self-regulatory principles for interest-based advertising and participate in industry opt-outs from such ads. This does not opt you out of receiving advertising; you will continue to get other ads by advertisers not listed with these self regulatory tools. You can also opt-out specifically from our uses of certain categories of data to show you more relevant ads.

Info to Ad Providers

We do not share your personal data with any third-party advertisers or ad networks for their advertising except for: (i) hashed or device identifiers (to the extent they are personal data in some countries); (ii) with your separate permission (e.g., lead generation form) or (iii) data already visible to any users of the Services (e.g. profile). However, if you view or click on an ad on or off our site or apps, the ad provider will get a signal that someone visited the page that displayed the ad, and they may through the use of mechanisms such as cookies determine it is you. Advertising partners can associate personal data collected by the advertiser directly from you with our cookies and similar technologies. In such instances, we seek to contractually require such advertising partners to obtain your explicit, opt-in consent before doing so.

2.5 Marketing

We promote our Services to you and others.

We use data and content about Members for invitations and communications promoting membership and network growth, engagement and our Services.

2.6 Developing Services and Research

We develop our Services and conduct research.

Service Development

We use data, including public feedback, to conduct research and development for the further development of our Services in order to provide you and others with a better, more intuitive and personalized experience, drive membership growth and engagement on our Services, and help connect professionals to each other and to economic opportunity.

Other Research

We seek to create economic opportunity for Members of the global workforce and to help them be more productive and successful. We use the personal data available to us to research social, economic and workplace trends such as job availability and skills needed for these jobs and policies that help bridge the gap in various industries and geographic areas. In some cases, we work with trusted third parties to perform this research, under controls that are designed to protect your privacy. We publish or allow others to publish economic insights, presented as aggregated data rather than personal data.

Surveys

Polls and surveys are conducted by us and others through our Services. You are not obligated to respond to polls or surveys, and you have choices about the information you provide. You may opt-out of survey invitations.

2.7 Customer Support

We use data to help you and fix problems.

We use the data (which can include your communications) to investigate, respond to and resolve complaints and Service issues (e.g., bugs).

2.8 Aggregate Insights

We use data to generate aggregate insights.

We use your data to produce and share aggregated insights that do not identify you. For example, we may use your data to generate statistics about our members, their profession or industry, to calculate ad impressions served or clicked on, or to publish visitor demographics for a Service or demographic workforce insights.

2.9 Security and Investigations

We use data for security, fraud prevention and investigations.

We use your data (including your communications) if we think it's necessary for security purposes or to investigate possible fraud or other violations of our User Agreement or this Privacy Policy and/or attempts to harm our Members or Visitors.

3. How We Share Information

3.1 Our Services

Any data that you include on your profile and any content you post or social action (e.g. likes, follows, comments, shares) you take on our Services will be seen by others.

Profile

Your profile is fully visible to all Members and customers of our Services. Subject to your settings, it can also be visible to others on or off of our Services (e.g., Visitors to our Services or users of third- party search engines). As detailed, your settings, degree of connection with the viewing Member, the subscriptions they may have, their usage of our Services, access channels and search types (e.g., by name or by keyword) impact the availability of your profile and whether they can view certain fields in your profile.

Posts, Likes, Follows, Comments, Messages

Our Services allow viewing and sharing information including through posts, likes, follows and comments.

- When you share an article or a post (e.g., an update, image, video or article) publicly it can be viewed by everyone and re-shared anywhere (subject to your settings). Members, Visitors and others will be able to find and see your publicly-shared content, including your name (and photo if you have provided one).
- In a group, posts are visible to others in the group. Your membership in groups is public and part of your profile, but you can change visibility in your settings.
- Any information you share through companies' or other organizations' pages on our Services will be viewable by it and others who visit those pages.
- When you follow a person or organization, you are visible to others and that "page owner" as a follower.

- We let senders know when you act on their message, subject to your settings where applicable.
- Subject to your settings, we let a Member know when you view their profile.
- When you like or re-share or comment on another’s content (including ads), others will be able to view these “social actions” and associate it with you (e.g., your name, profile and photo if you provided it).

3.2 Communication Archival

Regulated Members may need to store communications outside of our Service.

Some Members need, for legal or professional compliance, to archive their communications and social media activity, and will use services of others to provide these archival services. We enable archiving of messages by those Members outside of our Services. For example, a financial advisor needs to archive communications with her clients through our Services in order to maintain her professional financial advisor license.

3.3 Others’ Services

You may link your account with others’ services so that they can look up your contacts’ profiles, post your shares on such platforms, or start conversations with your connections on such platforms. Excerpts from your profile will also appear on the services of others.

Subject to your settings, other services may look-up your profile. When you opt to link your account with other services, personal data will become available to them. The sharing and use of that personal data will be described in, or linked to, a consent screen

when you opt to link the accounts. For example, you may link your Twitter or WeChat account to share content from our Services into these other services, or your email provider may give you the option to upload your Fryends contacts into its own service. You may revoke the link with such accounts.

Subject to your settings, excerpts from your profile will appear on the services of others (e.g., search engine results, mail and calendar applications that show a user a “mini” Fryends profile of the person they are meeting or messaging, social media aggregators, talent and lead managers). “Old” profile information remains on these services until they update their data cache with changes you made to your profile.

3.4 Related Services

We share your data across our different Services and Fryends-affiliated entities.

We will share your personal data with our affiliates to provide and develop our Services. We may combine information internally across the different Services covered by this Privacy Policy to help our Services be more relevant and useful to you and others.

3.5 Service Providers

We may use others to help us with our Services.

We use others to help us provide our Services (e.g., maintenance, analysis, audit, payments, fraud detection, marketing and development). They will have access to your

information as reasonably necessary to perform these tasks on our behalf and are obligated not to disclose or use it for other purposes.

3.6 Legal Disclosures

We may need to share your data when we believe it's required by law or to help protect the rights and safety of you, us or others.

It is possible that we will need to disclose information about you when required by law, subpoena, or other legal process or if we have a good faith belief that disclosure is reasonably necessary to (1) investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (2) enforce our agreements with you, (3) investigate and defend ourselves against any third-party claims or allegations, (4) protect the security or integrity of our Service (such as by sharing with companies facing similar threats); or (5) exercise or protect the rights and safety of Fryends, our Members, personnel, or others. We attempt to notify Members about legal demands for their personal data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

3.7 Change in Control or Sale

We may share your data when our business is sold to others, but it must continue to be used in accordance with this Privacy Policy.

We can also share your personal data as part of a sale, merger or change in control, or in preparation for any of these events. Any other entity which buys us or part of our business will have the right to continue to use your data, but only in the manner set out in this Privacy Policy unless you agree otherwise.

4. Your Choices & Obligations

4.1 Data Retention

We keep most of your personal data for as long as your account is open.

We retain your personal data while your account is in existence or as needed to provide you Services. This includes data you or others provided to us and data generated or inferred from your use of our Services. Even if you only use our Services when looking for a new job every few years, we will retain your information and keep your profile open until you decide to close your account. In some cases we choose to retain certain information (e.g., visits to sites carrying our “share with Fryends” or “apply with Fryends” plugins without clicking on the plugin) in a depersonalized or aggregated form.

4.2 Rights to Access and Control Your Personal Data

You can access or delete your personal data. You have many choices about how your data is collected, used and shared.

We provide many choices about the collection, use and sharing of your data, from deleting or correcting data you include in your profile and controlling the visibility of your

posts to advertising opt-outs and communication controls. We offer you settings to control and manage the personal data we have about you.

For personal data that we have about you:

- **Delete Data:** You can ask us to erase or delete all or some of your personal data (e.g., if it is no longer necessary to provide Services to you).
- **Change or Correct Data:** You can edit some of your personal data through your account. You can also ask us to change, update or fix your data in certain cases, particularly if it's inaccurate.
- **Object to, or Limit or Restrict, Use of Data:** You can ask us to stop using all or some of your personal data (e.g., if we have no legal right to keep using it) or to limit our use of it (e.g., if your personal data is inaccurate or unlawfully held).
- **Right to Access and/or Take Your Data:** You can ask us for a copy of your personal data and can ask for a copy of personal data you provided in machine readable form.

You may also contact us using the contact information below, and we will consider your request in accordance with applicable laws.

4.3 Account Closure

We keep some of your data even after you close your account.

If you choose to close your Fryends account, your personal data will generally stop being visible to others on our Services within 24 hours. We generally delete closed account information within 30 days of account closure, except as noted below.

We retain your personal data even after you have closed your account if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and

abuse, enforce our User Agreement, or fulfill your request to “unsubscribe” from further messages from us. We will retain de-personalized information after your account has been closed.

Information you have shared with others (e.g., through messages, updates or group posts) will remain visible after you closed your account or deleted the information from your own profile or mailbox, and we do not control data that other Members copied out of our Services. Groups content and ratings or review content associated with closed accounts will show an unknown user as the source. Your profile may continue to be displayed in the services of others (e.g., search engine results) until they refresh their cache.

5. Other Important Information

5.1. Security

We monitor for and try to prevent security breaches. Please use the security features available through our Services.

We implement security safeguards designed to protect your data, such as HTTPS. We regularly monitor our systems for possible vulnerabilities and attacks. However, we cannot warrant the security of any information that you send us. There is no guarantee that data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

5.2. Cross-Border Data Transfers

We store and use your data outside your country.

We process data both inside and outside of the United States and rely on legally-provided mechanisms to lawfully transfer data across borders. Countries where we process data may have laws which are different, and potentially not as protective, as the laws of your own country.

5.3 Lawful Bases for Processing

We have lawful bases to collect, use and share data about you. You have choices about our use of your data.

At any time, you can withdraw consent you have provided by going to settings.

We will only collect and process personal data about you where we have lawful bases. Lawful bases include consent (where you have given consent), contract (where processing is necessary for the performance of a contract with you (e.g. to deliver the Fryends Services you have requested)) and “legitimate interests”.

Where we rely on your consent to process personal data, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object. If you have any questions about the lawful bases upon which we collect and use your personal data, please contact our Data Protection Officer.

5.4. Direct Marketing and Do Not Track Signals

Our statements regarding direct marketing and “do not track” signals.

We currently do not share personal data with third parties for their direct marketing purposes without your permission.

5.5. Contact Information

You can contact us or use other options to resolve any complaints.

If you have questions or complaints regarding this Policy, please first contact Fryends online. You can also reach us by physical mail. If contacting us does not resolve your complaint, you have more options. Residents in the Designated Countries may also have the right to contact our Data Protection Officer.