

Privacy Policy

In this policy, references to 16Persons , or to “we” or “us” are to MaxiQ Limited, with the registered office at Markou Drakou, 2A, Livadia 7060, Larnaka, Cyprus, and its affiliates. Individuals wishing to contact us about data protection issues may do so by writing to us at the above address or by emailing us at info@16persons.com.

MaxIQ Limited, d/b/a 16Persons (collectively, “**16Persons**”, “**us**”, “**we**” or “**Company**”) respect the privacy of its website users (“**User(s)**” or “**you**”) and are committed to protect their Users’ personal information. We believe that you have a right to know our practices regarding the information we may <https://16persons.com> collect and use about you when you use our website at <https://16persons.com> and its subdomains (collectively, the “**Site**”). Please read the following carefully to understand 16Persons’s views and practices regarding your personal information and how 16Persons will treat it. Capitalized terms which are not defined herein, shall have the meaning ascribed to them in our Terms of Use at [Please provide a link to the Terms of Use] (“**Terms of Use**”), into which this Privacy Policy is incorporated by reference.

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1. Who we are

In this policy, references to 16Persons, or to “we” or “us” are to MaxiQ Limited (reg. No. HE464763), with the registered office at Larnaca, Cyprus, and its affiliates. Individuals wishing to contact us about data protection issues may do so by writing to us at the above address or by emailing us at info@16persons.com.

2. Your acknowledgment of this policy

This Privacy Policy (“**Privacy Policy**”) details how your Personal Information collected via the Site is used and processed by 16Persons.

BY ENTERING, CONNECTING TO, ACCESSING OR USING THE SITE, CONTENT AND/OR OTHER COMPANY’S SERVICES, YOU ACKNOWLEDGE THAT YOU ARE OR HAVE HAD THE OPPORTUNITY TO BECOME AWARE OF AND AGREE (IN JURISDICTION WHERE SUCH CONSENT IS REQUIRED) TO THIS PRIVACY POLICY AND

16Persons'S PRACTICES DESCRIBED THEREIN, INCLUDING THE PROCESSING (INCLUDING COLLECTING, USING, DISCLOSING, RETAINING OR DISPOSING) OF YOUR INFORMATION UNDER THE TERMS OF THIS POLICY.

3. Which information may we collect about Users?

We collect from Users of our Site, two types of data and information:

3.1. Non-personal Information.

The first type is non-identifiable and anonymous information. Non-personal Information, which is being gathered, consists of technical information and behavioral information that does not pertain to a specific individual ("**Non-Personal Information**").

You may access and browse the Site without disclosing personal information, although, like most websites, we passively collect certain Non-Personal Information from your devices, including: (i) technical information such as the type and version of your device and its operating system, the type of browser, screen resolution, device browser and keyboard language, Wi-Fi connectivity and the type and name of your device and/or browser, etc.; and (ii) behavioral information which may include the User's click-stream on the Site, the activities of the User on the Site and additional information of a similar nature (collectively, "**Technical and Behavioral Information**"). We may also use third-party service providers, such as Google Analytics, to obtain detailed analytics on the device and the User's behavior on the Site. Please note that we or our third-party service providers will collect such Technical and Behavioral Information by using certain tracking technologies, such as cookies, as further detailed below.

3.2. Personal Information.

The other type of information we collect is individually identifiable information. To put it simply, this information identifies an individual or is of a private and/or sensitive nature, such as your contact information ("**Personal Information**"), including:

3.2.1. Personal Information which is provided voluntarily:

- Communications with 16Persons: Personal Information you provide to us as part of any communications with 16Persons, by any means, including by contacting us via the Site, by email or when approaching us through our social network pages (such information may include marketing and communication data that includes your preferences in receiving marketing from us and your communication preferences). Please note that we may record communications for quality assurance purposes and in order to improve our services.
- Information collected when performing Tests: our Site allows Users to take part in Personality tests ("**Tests**") and produce certain reports with respect thereto. In this context, we will collect: (i) all Personal Information provided by you voluntarily in the context of such Tests including your name, email address and demographic information, (ii) your engagement with the Test, including the questions you answer, your selected answers, the time taken to answer each question and the date and time of the Test, and (iii) the results of your Test, including your personality types and any other statistics, reports and scores produced as part of the Test.
- Contact Details: Personal Information is collected from the details the Users provide in the "Contact Us" tab available on the Site. Such Personal Information includes your full name, email address, and your Test ID number. You may provide via the contact form any text you wish to insert into the "message" box. Additional information may be requested via the contact form in the future.
- Mailing list: you may voluntarily join our mailing list by providing us with your email address via our Site.
- Payments. Certain fees may be charged for our services, and you will have the option to use certain Online Payment Processors which will require you to fill out a billing form wherein you will be required to provide to such Online Payment Processors certain Personal Information (such as, a credit card number and other related billing information). We will not store such information on our servers. We only keep token information such Online Payment Processors provide us with (and where applicable, the last four digits of your credit card number), and such information is strictly secured.

3.2.2. Personal Information collected via technology:

- Geolocation data: during your visit to the Site we will access, collect, process, monitor and/or remotely store “geolocation data”, including through the collection of IP addresses and other similar information to determine your location for analytics, advertising and security purposes.
- Technical and Behavioral Information: to the extent that the Technical and Behavioral Information detailed above under Section 1 will be linked to or associated with a specific individual then such information will be considered as Personal Information.
- Identifiers: such as Internet Protocol (IP) address, your Unique Device Identifier (UDID), or other unique identifiers for security purposes, analytics and in order to provide you with targeted advertising of our products and services.

3.2.3. Information from other sources:

- We also obtain information from other sources, which may include, but not limited to, publicly-available sources, information provided by third parties which helps us determine your location based on your IP address and data providers, such as Google Analytics, from which we obtain demographic, interest based and online advertising related data.

3.3. Please note:

- We may cross-reference your Personal Information with other Personal Information we may have about you. Any Non-personal Information connected or linked to or associated with any Personal Information shall be deemed as Personal Information as long as such connection, linkage or association exists.
- We use third-party tracking services and usage logs, to track and analyze data from Users of the Site and for purposes of security and fraud prevention. We may also use cookies to gather information regarding your use of the Site and the information for which you searched and accessed (for more information please see below).

4. How do we collect information about our Users?

There are three main methods we use to collect information:

4.1. **We collect information through your entry, connection, access and/or use of the Site.** In other words, when you access or use the Site, we are aware of your usage of the Site, and may gather, collect and record the information relating to such usage. For example, when you use the Site, we gather your Technical and Behavioral Information.

4.2. **We collect information which you provide us voluntarily.** For example, we collect Personal Information that you provide via the “Contact Us” form on our Site. We will inform you prior to collecting your Personal Information if it is requested on a voluntary basis and the consequences of not providing voluntary Personal Information.

4.3. **We collect information from public sources.** We may supplement personal information that we collect about you with information which you have made public on websites associated with you on social media platforms such as LinkedIn, Facebook etc.

5. What are the purposes of the collection and processing of information?

5.1. Non-personal Information is processed in order to:

- Enhance the User’s experience on the Site;
- Create statistical information and learn about the preferences of Users and general trends on the Site (e.g. understand which features are more popular than others); and
- Keep the Site safe and secured against fraudulent and criminal activity.

5.2. Personal Information is processed in order to:

- Enable the operation of the Site and provide you with the Tests;
- Improve our Site, Tests and related services;
- Add your contact details to our mailing list for the purposes of sending you information about our products and services by email. You have the right to opt-out of marketing messages at any time by following the instructions in such messages or by contacting us at: info@16persons.com;
- Enable our third-party advertising service providers to present you with 16Persons’s advertisements on websites across the Internet and across devices. You may opt-out from such advertising activities by following the directions detailed below;

- Personalize your experience on the Site;
- Ensure that content on the Site is presented in an optimal way for you and for your device (e.g. tablet, mobile phone);
- Send you by email updates, notices, announcements, and additional information related to 16Persons including with respect to changes made to our Site's Terms of Use and Privacy Policy;
- Conduct internal operations, such as: troubleshooting, data analysis, testing, research, and statistical analysis;
- Keep the Site safe and secured against fraudulent and criminal activity;
- Comply with our legal obligations and provide us with the ability to protect our rights and legitimate interests;
- Maintain our data processing records and general administrative purposes; and
- Email tracking – we may use tracking technology within the email we may send you in order to improve interactions with you and to better understand whether our emails were opened and read, and such tracking may include capturing the time and date in which you opened our email messages and the type of device you use to open such emails.

5.3. Legal Basis for processing:

In order for the Company to process your Personal Information, as detailed herein, such processing must be justified by a “basis” for processing. Please note that the Personal Information processing activities detailed herein may be justified on the basis that:

- the processing is necessary for performance of a contract or in order to take steps prior to entering into a contract – other than as stated below, we process all of the Personal Information detailed under Section 2 above, solely in order to enable you to use the Site and the Tests. As such, Personal Information is processed on the basis of performance of the contract between you and the Company, namely our Term of Use;
- the processing is based on your consent – where you provide us with your consent to contact you for marketing purposes, process your Personal Information for targeted advertising, or when we use cookies to collect information about your use of the Site, you will be asked to consent to such activities before we can process such information. If you choose not to give us your consent for such processing activities, or if you decide later to remove your consent, this may affect our ability to provide you with some of the services available on our Site;
- the processing is necessary to comply with a legal obligation – we may process your Personal Information for disclosure of information to authorities; and
- the processing is in our legitimate commercial interests – subject to your interests and fundamental rights, under our legitimate interest in marketing our products and services via the Site and offering the public comfortable and safe access to our Site, we shall perform the Personal Information processing activities described herein, such as the processing of your Personal Information in order to personalize the Site, assisting us to prevent crime and fraud, manage our internal operations, maintaining records and email tracking. We may also use the information contained in certain cookies and other such files or tags based on such ground for our legitimate interests in a safe and user-friendly presentation of our Site. Where we rely on legitimate interests as a lawful basis, we will carry out a balancing test to ensure that your interests, rights and freedoms do not override our legitimate interests.

6. Sharing Personal Information with Third Parties

6.1. 16Persons respects your privacy and will not disclose, share, rent, or sell your Personal Information to any third party, other than as permitted under this Privacy Policy.

6.2. In addition to using the information collected by us for the purposes described under Section 6 above, we may also share your information in the following cases:

- 16Persons Personnel: Personal Information that we collect and process may be transferred to or accessed by personnel of 16Persons for the sole purpose of enabling the operation of the Site and to contact you (as detailed in Section 5 above). Please note that all 16Persons personnel that will have access to your Personal Information are under an obligation of strict confidentiality with respect to such Personal Information.
- Service Providers: we share Personal Information with vendors, commercial software providers, consultants and data processors who perform services on our behalf, including without limitation, companies that provide analysis, messaging services and services which host the Site. Please note that we collect, hold and manage your Personal Information through a third party's cloud based services, as reasonable for business purposes, which may be located in countries outside of your jurisdiction. For more information regarding our Service Providers, please refer to Section 11
- In addition, we may share Personal Information in the following cases: (a) to satisfy any applicable law, regulation, legal process, subpoena or governmental request; (b) to enforce this Privacy Policy or any other agreement or terms of service between you and 16Persons, and to defend against any claims or demands asserted against us by you or on your behalf; (c) to detect, prevent, or otherwise address fraud, security or technical issues; (d) to protect the rights, property, or personal safety of 16Persons, its Users or the general public; and (e) when 16Persons is undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of the assets of 16Persons (while such acquired company or investor may be located in countries outside of your jurisdiction).

6.3. For avoidance of doubt, 16Persons may transfer and disclose **Non-personal Information** to third parties at its discretion including without limitation for statistical, analytical and research purposes and for customization, developing and improvement of our Site.

7. Your Rights

16Persons acknowledges you may have certain right under applicable law with respect to the Personal Information that we process about you. We hereby inform you of the following rights, in respect of your Personal Information:

- Right to access: you may have the right to request a review of your Personal Information held by the Company. We may refuse to comply with your access request if the request is manifestly unfounded, excessive or repetitive in nature.
- Right to rectification: if the Personal Information processed by the Company is incorrect, incomplete or not processed in compliance with applicable law or this Privacy Policy, you may have the right to have your Personal Information rectified.
- Right to erasure: under certain conditions, you may be entitled to require that the Company will delete or “block” your Personal Information (e.g. if the continued processing of those data is not justified).
- Right to Portability: you may have the right to transfer your Personal Information between data controllers (i.e., to transfer your Personal Information to another entity). The right to data portability only applies where your Personal Information is processed by us with your consent or for the performance of a contract and when processing is carried out by automated means.
- Right to object to or withdraw consent: where that lawful basis for processing your Personal Information is either “public interest” or “legitimate interests”, those lawful bases are not absolute, and you may have a right to object to such processing. Where you object on grounds of legitimate interest, we shall no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims. If the processing of your Personal Information is based on your consent, you have the right to withdraw your consent to such processing at any time.
- The right to restrict processing: under certain circumstances, you may have the right to object to the processing of your Personal Information due to your particular situation.
- Right to lodge a complaint: you have the right to lodge a complaint before the relevant data protection authority or supervisory authority of your jurisdiction.

To exercise these rights, where applicable, please contact us by sending an email to: info@16persons.com.

8. Location of Your Data

The Personal Information collected from you by 16Persons, as detailed in this Privacy Policy, may be transferred to, and stored in, servers which may be located in countries outside of your jurisdiction and in countries that are not considered to offer an adequate level of protection under your local laws. It may also be processed by 16Persons and its suppliers, service providers or partners’ staff operating outside your country.

16Persons is committed to protecting your Personal Information and will take appropriate steps to ensure that your Personal Information is processed and stored securely and in accordance with applicable privacy laws, as detailed in this Privacy Policy. You have a right to request further information regarding the data transfer mechanisms used by us with respect to data transfers to third countries.

Without derogating from the generality of the foregoing and in order to keep your Personal Information safe, we apply strict safeguards when transferring it outside of the EEA, which may include the following:

- Transferring your personal information to countries approved by the European Commission as having adequate data protection laws, such as Israel; and
- Entering into standard contracts that have been approved by the European Commission and which provide an adequate level of high quality protection, with the recipients of your Personal Information.

BY SUBMITTING YOUR PERSONAL INFORMATION TO 16Persons, YOU ACKNOWLEDGE, AND AGREE, IN JURISDICTION WHERE SUCH CONSENT IS REQUIRED, TO SUCH TRANSFER, STORING AND/OR PROCESSING OF PERSONAL INFORMATION.

9. Payment

We accept certain online payment methods, using our Online Payment Processors, which enable Users to send and receive payments securely online using a credit card or bank account. We may add or change the Online Payment Processors at our sole discretion. 16Persons is not affiliated with such Online Payment Processors (for more information see our TOU), as each is an independent contractor, and neither is the agent or employee of the other, and neither is responsible in any way for the actions or performance (or lack thereof) of the other. The use of the Online Payment Processors is at the User's discretion and sole liability and risk. It is the User's responsibility to abide by all the terms specified by the Online Payment Processors in their terms of use and privacy policies, including but not limited to any age restrictions specified therein. You acknowledge that you are fully assuming the risks of conducting any transactions via the Online Payment Processors.

10. **Social Features**

Our Site may include social media features, such as Facebook, Twitter, LinkedIn and YouTube links ("**Social Features**"). The Social Features are operated or allow for social integration with certain third party social networks or third party Sites ("**Social Network**"). These Social Networks are created and maintained by third parties who are not affiliated with and/or controlled by 16Persons. If you enable this integration with such Social Networks, your use of the Social Features is subject to the applicable third party Social Network's terms of use and privacy policies. You should ensure that you read their terms of use and privacy policies to understand how they treat your information and in order to understand the methods for changing the privacy or sharing settings on such services. If you do not agree to the practices described in such terms you should not allow the Site to interact with such Social Networks, however you may find that you are not able to enjoy all the features that may be made available via the Site. You understand that where you allow interaction with any third party Social Network, we may share data about you with your contacts (and *vice versa*) in order that you may enjoy social elements. This data may include, *inter alia*, your name and your social media profile picture. By using the Social Features, you hereby agree and understand that the applicable Social Networks may collect certain Personal Information, such as your IP address, Non-personal Information and may set cookies and/or other web tracking technologies to enable the functionality of the Social Features. The use of such features enables the sharing of information with your friends or the public, depending on the *settings* you establish with the third party that provides the Social Features. You hereby understand and agree that when you share content from Social Networks, your content may become public and others may re-post-it.

11. **Minors**

The Site is intended for Users over the age of sixteen (16). Therefore, 16Persons does not intend and does not knowingly directly collect any Personal Information from children under the age of sixteen (16) and does not wish to do so. We reserve the right to request proof of age at any stage so that we can verify that minors under the age of sixteen (16) are not using the Site.

12. **Third Party Service Providers**

12.1. During your visit to our Site, we may use third party service providers, who may collect, store and/or process your information, as detailed in this Privacy Policy. Please read such third party service providers' terms of use and privacy policies to understand their privacy practices.

12.2. Note, that we collect, hold and/or manage your Personal Information through 16Persons's authorized third party vendors of certain products or services (such as hosting cloud services) (including, as applicable, their affiliates) solely and limited to providing us with such requested services, and not for any other purposes.

12.3. Such vendors may be located in countries that do not have the same data protection laws as the laws applied in your jurisdiction.

12.4. Such third parties service providers may include without limitation the following categories of service providers:

- Online Payment Processors, including Paypal; Stripe.
- Cloud servers, including OVH; HWS.
- Advertising platforms, including Google; Facebook; Taboola; Outbrian.
- Certificates creator including Adobe PDF

13. **Cookies**

13.1. When you access or use the Site, we and/or our third party service providers may use industry-wide technologies such as cookies, web beacons, pixels, clear gifs and other similar tools (or other similar technologies) (collectively, “**Cookies**”) which may enable us, amongst others, to recognize your device from those of other Users of the Site, to improve the Site’s performance, to deliver a better and more personalized service according to our Users’ individual interests and the device or browser used, to track Users’ use of the Site, to gather information about the Users’ approximate geographic location (e.g. city), to prevent fraud and/or abuse, to estimate our audience size and usage pattern and perform other analytics, to develop our Site and to serve targeted advertisements.

13.2. Cookies may locally store certain Technical and Behavioral information and other Personal Information on your device and we and/or our authorized third party service providers may access such information for the purposes detailed under this Privacy Policy. We and/or our authorized third party service providers may use both session Cookies (which expire once you close the web-browser) and persistent Cookies (which stay on the User’s device until he/she deletes them).

13.3. Most devices and browsers will allow you to erase Cookies from your device’s hard drive, block acceptance of Cookies, or receive a warning before a Cookie is stored on your device. However, if you block or erase Cookies, your experience of the Site may be limited.

13.4. For detailed instructions regarding the blocking of Cookies, please refer to your browser’s ‘help’, ‘tool’ or ‘edit’ sections or see <http://www.allaboutcookies.org/manage-cookies/>. Below are links to instructions regarding the blocking of Cookies on commonly used web-browsers: [Chrome](#), [Internet Explorer and Microsoft Edge](#), [Mozilla Firefox](#) and [Safari](#).

13.5. It is possible to opt-out of having your browsing activity within the Site recorded by performance cookies. Please note that we use Google Analytics as our service provider in order to track Users’ activities on the Site, including by use such services’ persistent cookies. Google provides a browser-add on which allows users to opt-out of Google Analytics across all websites, which can be downloaded here: <https://tools.google.com/dlpage/gaoptout>.

13.6. You can opt out of receiving interest-based advertising on your device by visiting the following sites: www.aboutads.info/choices/, www.networkadvertising.org/choices/, choices.ghosteryenterprise.com/global-opt-out.html, and preferences-mgr.truste.com/. If you wish to opt out of receiving interest-based advertising on your mobile device, please see the advertising preferences information on support.apple.com for iOS devices or support.google.com for Android devices.

14. **Links to Third Party Websites**

Certain links provided in the Site permit Users to leave our Site and enter non-16Persons sites or services. Most of such linked sites and services provide legal documents, including terms of use and Privacy Policy governing the use thereof. It is always advisable to read such documents carefully before using those sites and services, *inter alia*, in order to know what kind of information about you is being collected.

15. **Security**

15.1. We take appropriate measures to maintain the security and integrity of our Site and prevent unauthorized access to it or use thereof through generally accepted industry standard technologies and internal procedures.

15.2. Your Personal Information is hosted on third party servers, which provide advanced strict security standards (both physical and logical).

15.3. Some of the security measures that we employ include, without limitation: the application of highly secure design and implementation methods to all our services, including state of the art encryption mechanisms and secure architecture design to all storage and transmission mechanisms used for the processing and transmission of your Personal Information, as well as access control and auditing systems (including firewall and identity management solutions), that restrict access to your Personal Information to authorized personnel only, based on their roles and their need-to-know requirements, needed to process your Personal Information on 16Persons's behalf.

15.4. Please note, however, that there are inherent risks in transmission of information over the Internet or other methods of electronic storage and we cannot guarantee that unauthorized access or use will never occur.

15.5. 16Persons will comply with applicable law in the event of any breach of the security, confidentiality, or integrity of your Personal Information and will inform you of such breach as required by applicable law.

15.6. TO THE EXTENT THAT 16PERSONS IMPLEMENTED THE REQUIRED SECURITY MEASURES UNDER APPLICABLE LAW, 16PERSONS SHALL NOT BE RESPONSIBLE OR LIABLE FOR UNAUTHORIZED ACCESS, HACKING, OR OTHER SECURITY INTRUSIONS OR FAILURE TO STORE OR THE THEFT, DELETION, CORRUPTION, DESTRUCTION, DAMAGE, OR LOSS OF ANY DATA OR INFORMATION INCLUDED IN THE PERSONAL INFORMATION.

16. Data Retention

16Persons will retain the Personal Information for as long as we are confident that it is accurate and can be relied upon. Personal Information which is no longer required for the purpose for which it was initially collected will be deleted unless we have a valid justification to retain it which is permitted under applicable law, such as to resolve disputes or comply with our legal obligations.

17. Changes to the Privacy Policy

16Persons reserves the right to change this Privacy Policy at any time, so please re-visit this page frequently to check for any changes. In case of any material change, we will make reasonable efforts to post a clear notice on the Site or we will send you an e-mail regarding such changes to the e-mail address that you may have provided us with. Such material changes will take effect seven (7) days after such notice was provided on our Site or sent to you via e-mail, whichever is the earlier. Otherwise, all other changes to this Privacy Policy are effective as of the stated "Last Revised" and your continued use of the Site on or after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes. In the event that the terms should be amended to comply with any legal requirements, the amendments may take effect immediately, or as required by the law and without any prior notice.

18. Have any Questions?

If you have any questions (or comments) concerning this Privacy Policy, please send us an email to the following address: info@16persons.com, or at our [contact form](#) and we will make an effort to reply within a reasonable timeframe.

