

Orbit Communication Systems Ltd.

## Candidate Privacy Policy

Last Update: \_\_ May 2026

The purpose of this Candidate Privacy Policy (the "**Policy**") is to describe how Orbit Communication Systems Ltd., Company No. 512406695 (the "**Company**") handles the Personal Data of job candidates (whether as employees or independent contractors), including the types of Personal Data that are collected and processed by the Company (directly or through third-party service providers), the purposes of such processing, the third parties with whom the data may be shared and for what purpose, and the rights of candidates with respect to their personal data.

"**Personal Data**" means any information relating to an identified or identifiable natural person, who can be identified, directly or indirectly, by reasonable means; "**Processing**" of Personal Data means any operation performed on Personal Data, including its receipt, collection, storage, copying, review, disclosure, exposure, transfer, delivery, or the granting of access thereto.

For the avoidance of doubt, you are not legally required to provide the Company with Personal Data, and providing such data is subject to your consent. However, without the provision of Personal Data (in accordance with this Policy, including the requirements to refrain from providing sensitive Personal Data or any information that is not required for the recruitment process), the Company may be unable to consider your application or otherwise communicate with you.

Please read this Policy carefully before providing any Personal Data to the Company. **If you do not agree to this Policy, you must refrain from applying for positions at the Company. By applying for a job or providing Personal Data to the Company in the context of the recruitment process, you consent to this Policy.**

For clarity, in the course of the recruitment process, you should not provide the Company with Personal Data relating to any third party (including references) unless you have obtained such third party's consent to both the disclosure of such data to the Company and this Policy. If you choose to do so, you represent that you have obtained all relevant consents or are otherwise authorized to do so under applicable law.

You may contact the Company with any questions or comments regarding this Policy by email at [Talent@orbit-cs.com](mailto:Talent@orbit-cs.com) and the Company will make reasonable efforts to respond within a reasonable time.

This Policy applies equally to all genders.

### 1. **Collection and Provision of Personal Data**

- 1.1. In connection with an application for employment with the Company, candidates may be asked to provide the Company with Personal Data, including:
  - 1.1.1. **Identifying information.** First and last name.
  - 1.1.2. **Contact details.** Email address and mobile phone number.
  - 1.1.3. **Demographic information.** Address.
  - 1.1.4. **Professional Information.** Such as CVs, educational background, professional experience, certificates relating to education or training, and details of references or letters of recommendation.
  - 1.1.5. **Employment-related information.** Such as salary expectations.
  - 1.1.6. **Any other Personal Data that you choose to share with the Company,** such as hobbies, community activities, etc.

<b><u>Important clarifications:</u></b>
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- Candidates are not legally required to provide the Company with Personal Data. However, if a candidate does not provide Personal Data relevant to the assessment of their application, the Company may be unable to evaluate their suitability for employment.
- Candidates should refrain from providing Personal Data that they do not want to share.
- **The Company does not request that candidates provide Personal Data that is not directly related to their recruitment**, including Personal Data unrelated to their education or professional experience relevant to the position.
- **The Company requests that candidates refrain from providing sensitive Personal Data**, such as information relating to their health, sexual orientation, religious beliefs, or political affiliation. For the avoidance of doubt, if a candidate chooses to disclose such sensitive Personal Data, it will not serve as a basis for any hiring decision. Where the provision of sensitive Personal Data is required for certain positions (such as specific medical information), this will be expressly indicated.
- In the case of positions that require integrity testing or professional assessment tests, the Company will notify candidates in advance and make appropriate arrangements for the provision of only minimal information, solely for the purpose of conducting such tests and assessing the candidate's suitability for the position.

- 1.2. **Collection of Personal Data from additional sources.** The Company collects professional information about candidates (after they have chosen to apply for employment directly with the Company or through a third party providing recruitment services) from additional sources, including recruitment and placement agencies, publicly available sources, third parties such as references (whose details were provided by the candidate), professional social networks (such as LinkedIn), the candidate's professional publications, conferences, professional forums, etc.

## 2. Purposes for Which Personal Data Is Processed

The Company processes job candidates' Personal Data for the following purposes:

- 2.1. Recruitment for positions with the Company (including screening, selection, interviews, etc.).
- 2.2. Contacting the candidate, including future outreach for the purpose of exploring potential future employment opportunities, or updating information relating to professional experience or contact details ("**Future Outreach**"), subject to the candidate's right to request at any time that the Company cease such Future Outreach.
- 2.3. Compliance with applicable law and regulation (including court orders or directives of a competent authority).
- 2.4. Monitoring and improving the Company's recruitment processes.
- 2.5. Deriving insights, generating aggregated, statistical, or other anonymized information for the purposes of the Company's operations, provided that such information, once generated, does not include the Personal Data from which it was derived.
- 2.6. **Use of artificial intelligence tools.** The Company may use artificial intelligence tools as part of its recruitment process, primarily for technical purposes, such as screening and sorting CVs. For the avoidance of doubt, any such use will be subject to the terms of this Policy, including measures to ensure fairness and appropriate security and oversight arrangements, and no material decisions shall be made without human involvement.

## 3. Storage and Security of Personal Data

- 3.1. The Personal Data that the Company processes is stored in its databases, which are maintained in accordance with applicable law.

- 3.2. The Company employs reasonable measures (logical, physical, and administrative) to secure Personal Data. However, it is acknowledged that the ability to completely prevent information security incidents is limited. Accordingly, candidates are advised to refrain from providing Personal Data that is not relevant to the recruitment process and, in particular, to refrain from providing sensitive Personal Data in the course of the recruitment process.
- 3.3. The Company's responsibility is to implement such measures and to address incidents as required by applicable law. However, subject to the implementation of such measures, the Company shall not be liable for any damage (direct or indirect) caused by an information security incident or a cybersecurity event.

#### **4. Transfer and Sharing of Personal Data**

- 4.1. The Company may transfer Personal Data to third parties in the following circumstances and for the following purposes:
  - 4.1.1. To comply with legal or regulatory requirements, including directives of a competent authority.
  - 4.1.2. With the consent (express or implied) of the candidate, such as contacting references whose names the candidate has provided to the Company.
  - 4.1.3. To third parties in Israel or abroad that provide the Company with services relating to recruitment (such as technology service providers, recruitment service providers, etc.).

The Company's service providers are bound by obligations of confidentiality and information security and may use Personal Data solely for the purpose of providing services to the Company, except to the extent required for security purposes, compliance with applicable law, or the derivation of insights, statistical information, or other anonymized information for the purpose of improving their services.

#### **5. Retention and Deletion of Personal Data**

- 5.1. Personal Data of candidates who are not hired by the Company will be retained for a period of up to **three years** from the conclusion of the recruitment process or the last contact between the parties (during which the continued need for retention will be periodically reviewed), and will thereafter be deleted, unless retention is required by law or for the protection of the Company's legitimate interests.
- 5.2. Personal Data of candidates who become employees of the Company will be retained as part of the Company's employee records and will be handled in accordance with the Company's policies for the handling of such data. Personal Data of candidates who become contractors of the Company will be retained as part of the Company's contractor records.

#### **6. Candidates' Rights with Respect to Their Personal Data**

- 6.1. Every candidate has the right to request access to the Personal Data processed about them by the Company, whether directly or through an authorized representative. The Company will honor such requests unless there is a lawful basis to deny them, including under applicable case law.
- 6.2. The process for exercising these rights will be determined by the Company from time to time, in accordance with the Protection of Privacy Regulations (Conditions for Review of Information and Procedures for Appellate on Refusal to Review Requests), 5741–1981, and the guidelines of the Registrar of Databases.
- 6.3. A candidate who believes that the information held about them is inaccurate, unclear, incomplete, or not up to date is entitled to request that such information be corrected or deleted. The Company will honor correction or deletion requests unless there is a lawful basis to deny them.
- 6.4. To exercise your rights, please contact the Company using the contact details set out below.

- 6.5. The Company will respond to requests for access, correction, or deletion within a reasonable time and no later than thirty (30) days after receipt of the request.
- 6.6. If a candidate's request for access, correction, or deletion is denied, the candidate may appeal to the Magistrate's Court in the manner prescribed by the aforementioned Regulations.

7. **Updates to the Policy**

The Company may update this Policy from time to time, provided that such updates do not impair candidates' rights that arose prior to such update.

8. **Contact Information**

Any questions regarding this Policy, as well as requests to exercise candidates' rights as described above, may be directed to the Company using the following contact details:

By mail: [marketing@orbit-cs.com](mailto:marketing@orbit-cs.com)

By e-mail: [Talent@orbit-cs.com](mailto:Talent@orbit-cs.com)

By phone: [+972 9 892 2777](tel:+97298922777)