

SmartA Solutions LLC, HCM Army LLC (“we” or “us”), and their respective subsidiaries are committed to protecting the privacy of our site visitors, users, customers, employees, and job applicants. This privacy policy contains important information about how we use your personal information. This Privacy Policy was last updated in April 2021.

INFORMATION WE COLLECT:

We may gather the following information about you when you use this website, and at times we may ask you to provide additional personal information.

- Name
- Email address
- Telephone number
- Location
- Address
- Company
- Job Title
- IP address or your computer and device
- Mobile device ID
- Information with submitting a job application to us (e.g., Gender, Ethnic origin, etc.)

We will use your personal information in the following ways. We are required by law to state a “legal basis for processing,” and this is also set out below:

- To communicate with you regarding our products and/or services
- To fulfill the purpose(s) for which the information was collected/provided, including providing contractually obligated products and/or services
- To improve our website, products, and services through testing, research, analysis, and product development

- Respond to specific queries you may raise regarding our company and its operating companies.
- To deliver the best online experience by understanding how you use our website to provide you with better ways of accessing information
- Process and consider your job application.

LEGAL BASIS FOR PROCESSING:

- Consent – we only use your PI for this purpose if you have asked us to do so. You can withdraw your consent at any time.
- Our legitimate interests – we use your PI to help us to deliver the best online experience to you and other website users.
- Our legitimate interests – we use your PI our employees and job applicants for
 - Payroll administration;
 - Filling open employment positions;
 - Maintaining accurate benefits records;
 - Complying with governmental reporting requirements;
 - Performance management;
 - Provision of company network access;
 - Authentication of individuals; and
 - Security, health, and safety management.

SHARING INFORMATION WITH OUR THIRD PARTIES

We may send your personal information to other group companies, affiliates, and third parties to help us process your personal information for the purposes set out in this policy. We may disclose your personal information if we or any of our assets are the subject of a sale or similar corporate

transaction. We will ensure that the third parties who receive your personal information are required to keep it confidential.

We are a global company, and therefore we may transfer your personal information to countries around the world, including the US and other countries outside Europe. We will keep your information until you ask us to delete it.

COOKIES AND OTHER TRACKING TECHNOLOGIES?

A cookie is a small amount of data that our website stores on your computer and which we can later retrieve. The cookie cannot be read by a site other than ours. As discussed in our section on Use of your PI, we use cookies for a number of administrative purposes, including storing your preferences, allowing us to provide website visitors with a better experience.

To improve the content and format of our site, we use website tracking software to automatically capture technical information stored in our server's log files.

We also utilize cookies and other tracking technologies to measure the preferences of our website visitors, analyze trends, administer the website, track users' movements around the website, and gather demographic information about our user base as a whole.

THIRD-PARTY WEBSITES

Our website links to third-party sites which we do not operate or endorse. These websites may use cookies and collect your personal information in accordance with their own privacy policies. This privacy policy does not apply to third-party websites, and we are not responsible for third-party websites.

UNDER 13-YEAR OLD

This website is not intended or designed to attract children under the age of 13. We do not knowingly collect personal information from or about any person under the age of 13. If you are under 13 years old and wish to ask a question or use this site in any way which requires you to submit your personal information, please get your parent or guardian to do so.

CONTACT US

If you wish to exercise any of your rights concerning your personal information or if you have any queries about how we use your personal information, please let us know by contacting our Data Protection Officer at contactus@hcmarmy.com

CHANGES TO THIS PRIVACY POLICY

We review this privacy policy regularly to ensure that it is up to date with our use of your personal information, and compliant with applicable data protection laws. We reserve the right, at our discretion, to revise this privacy policy at any time. The updated privacy policy will be posted on our website. You are encouraged to review this privacy policy from time to time.