

## PRIVACY POLICY

*(Last modified: February 2022)*

This privacy policy ("**Privacy Policy**") governs the data collection, processing, and usage made by Y.A. Appscent Ltd. ("**Company**") "**we**" or "**us**") with respect to the data we collect from individuals who access and use our website (respectively "**Website**" and "**Visitors**" or "**you**").

This Privacy Policy constitutes an integral part of the Website's terms of use or any other agreement between us and you (together "**Terms**"), and provides you with information regarding our processing operation, the lawful basis pursuant to which we process your Personal Data (as defined below), third parties to whom Personal Data will be transferred, data retention periods, as well as your rights under applicable privacy laws. Definitions used herein but not defined herein shall have the meaning ascribed to them in the Terms.

If you have any questions about this Privacy Policy, please contact us at: info@appscent.co.il.

**You are not required by law to provide us with any Personal Data. Sharing Personal Data with us is entirely voluntary. However, in some cases, without providing your data we would not be able to provide you with all or some of our Services.**

**Please note that these policy does not govern the use of any of our products. Any such usage is subject to a separate terms and policies attached to.**

### **AMENDMENTS**

We reserve the right to periodically amend or revise the Privacy Policy, which will immediately affect the implementation of the revised Privacy Policy on our Website. The last revision date will be reflected in the "*Last Modified*" heading located at the top of the Privacy Policy. We will make a reasonable effort to notify you if we implement any changes that substantially change our privacy practices. However, regular and ongoing changes may apply through the publication of the amended policy in the Website. We recommend that you review this Privacy Policy periodically to ensure that you understand our privacy practices and to check for any amendments.

### **WHO ARE WE AND OUR EU REPRESENTATIVE**

We are Y.A. Appscent Ltd., a company incorporated in Israel. Our address is: 15 Tidhar st., Ra'anana, HaMerkaz, Israel. Under the European General Data Protection Regulation ("**GDPR**"), we are the data controller of the Website Visitors' Personal Data.

Our Data Protection Representative (DPR) under Article 27 to the GDPR: [TBC after contracting a DPR – and also UK rep if relevant]

Questions, comments, requests and complaints regarding this Privacy Policy and the information we hold are welcome and should be addressed to us by using the contact details above. All requests will be dealt with promptly and efficiently.

### **COLLECTION OF NON-PERSONAL DATA**

We may collect aggregated, non-personal and non-identifiable information which may be made available or gathered via your use of our Website ("**Non-Personal Data**"). We are not aware of

the identity of the individual from which the Non-Personal Data is collected. Also, we may sometimes process and anonymize or aggregate Personal Data and identifiable information in a manner that shall create a new set of data that will be Non-Personal Data. Such a new data set can no longer be associated with any identified person. Non-Personal Data may be used by us without limitation and for any purpose, including for commercial, research, or statistical purposes, without further notice to you.

**COLLECTION OF PERSONAL DATA**

During your use of the Website, we will collect individually identifiable information, namely information that identifies an individual or may with reasonable effort be used to identify an individual (“**Personal Data**” or “**Personal Information**” as defined under applicable law). This may include online identifiers (e.g., IP address, cookies, etc), name, emails, address etc., subject to applicable law. If we combine Personal Data with Non-Personal Data, we will treat the combined data as Personal Data.

**PROCESSING OF PERSONAL DATA – PURPOSES AND LAWFUL BASIS**

We have included in the table below information about which data is processed, how we process and use your data and the lawful basis for which we do so subject to applicable laws, including the GDPR.

Type of Data	Purpose of Processing	Processing Action	Lawful Basis
<b>Contact us information</b>			
<p>If you voluntarily contact us in any manner, whether for partnering or to submit a request or for other inquiries, whether by sending us an email or through other means of communications, e.g., any online form available on the Website, such as “Contact us” form, you may be asked to provide us with your contact information such as your full name and email address. In addition, you can choose to provide us with additional information as part of your correspondence with us.</p>	<p>Addressing your inquiries and/or checking the option to provide you with services.</p>	<p>We will collect and process this data, store it in our systems, and check it with our contact history solely to respond to your inquiries and provide you with the support or information you have requested.</p> <p>We will retain our correspondence with you for as long as needed, subject to applicable law. Note that such correspondences can be retained in databases we use for this purposes and which we bought from third parties (i.e., SaaS platform such as CRM). In such cases, your data may</p>	<p>In case you contact us as a current partner or client - the lawful basis for processing your information will be the <b>contract</b> between you and us, meaning we will use the data for addressing your requests and inquiries.</p> <p>After completing any such request, we will retain your information as part of our business records under our <b>legitimate interest</b>.</p>

		<p>be shared and transferred to such third parties. For more information regarding data transfer and sharing see below.</p>	<p>In the event you contacted us as a prospect customer or partner we will also do so under our <b>legitimate interest</b>.</p> <p>In such cases, where we rely on our legitimate interest, you are entitled to object such processing based on our legitimate interests if you believe that your rights are overridden by our interests.</p>
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<b>Online identifiers and other Technical Data</b>			
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<p>When you access our Website or interact with it, we collect certain online identifiers, including your IP address.</p> <p>We may also collect technical Non-Personal Data transmitted from your device (<i>e.g.</i>, actions in the Website, your browser type, language used, type of operating system, type of device, etc.) and approximate geographical location (country). We collect this data from you automatically when you access the Website by using cookies or similar technologies.</p> <p>***Please see the following paragraph regarding Cookies usage.</p>	<p>Improving &amp; customizing the Website, safety, security and fraud prevention of our Website, and advertising purposes.</p>	<p>We, directly or through the use of third parties, will collect your data, aggregate it and statistically analyze it (whether alone or together with other Visitor's data), aggregate, generate reports based on such analysis and retain records of any such usage data.</p> <p>We process and retain this data for enhancing your experience and auditing and tracking usage statistics and traffic flow, customizing the Website for you or adjusting its content, including advertisements, for your use.</p> <p>We also process it for protecting the security of the Website, as well as our and third parties' rights</p>	<p>Processing of general, aggregated and statistical data for the proper management of our website and services, is based on the legal basis of our <b>legitimate interests</b> as a commercial business to track users who enter our Website for the mentioned purposes.</p> <p>when we use third-party cookies on the Website or collect online identifiers for our marketing activities, we will obtain your consent if required under applicable law.</p>
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		(subject to applicable law requirements).	
<b>Joining our team – Applying for a position via our website</b>			
<p>If you apply for any position in our Company through the Website or elsewhere. In that case, we will collect your first and last name, email address, phone number, CVs and additional information at your choice, such as a URL to your LinkedIn profile or a personal note you added.</p>	<p>Recruitment and employment</p>	<p>We will process your job application to further communicate with regarding job opportunism. We will also use your Personal Data to provide, operate, monitor, and maintain our recruitment activities, such as evaluate your application for employment and eventually and if applicable and relevant engage with you.</p> <p>We will retain and store your Personal Data to comply with laws or regulations and to review compliance with applicable usage terms, such as work eligibility in the country of employment. Also, we may keep it afterward as part of our business records.</p>	<p>The lawful basis for such processing will be the <b>contract</b> between us (or taking steps <b>prior to entering into a contract</b>) - we process your data as per your application to a position within our Company.</p> <p>After the recruitment process, we may keep your information under our <b>legitimate interests</b> as part of our ongoing business records and for future protection from any potential legal suit (i.e., Israeli statute of limitation a claim shall be barred following 7 years therefore we will retain restricted data about applicants for such reasons if we believe that we need to protect ourselves from legal claims). In such case you are entitled to object such</p>

			processing based on our legitimate interests if you believe that your rights are overridden by our interests.
<b>Subscribing to our newsletter list</b>			
In the event we will offer you to subscribe to our email listing to receive commercial materials such as newsletters, we will collect and process you email and name.	<b>Marketing</b>	We will use that information for adding you our marketing list and providing you with news and information regarding our products and services via our newsletter.	We will do that under your <b>consent</b> as provided in the course of subscribing to the newsletter list. You can always withdraw your consent by contacting us as detailed hereunder.

## **COOKIES USAGE**

Like many other websites, the Website uses cookies to improve your experience while you navigate the Website. We may use various types of Cookies:

- Essential Cookies – which are necessary for the site to work properly (usually appears under our name/cookie tag);
- Functional Cookies – designated to save your settings on the site - your language preference or other view preferences (also, under our name/cookie tag);
- Session Cookies – used to support the Website's functionality – such Cookies are stored only temporarily during a browsing session and are deleted from your device when you close the browser.
- Targeting Cookies - these cookies are used to collect information from you to help us improve our products and services and serve you with targeted advertisements that we believe will be relevant to you (e.g., Google’s AdSense or Tag Manger Cookies).
- Email activity tracking – through designated Cookies and tools while we use our email delivery services, (e.g. Mailchimp);
- Social networks Cookies - Social Plug-In Cookies (e.g., Facebook, Twitter, LinkedIn Cookies, or pixels) enable sharing your usage information with your social network’s accounts.
- Analytics Cookies - give us aggregated and statistical information to improve the Website and System and further developing it (e.g., Google analytics, Google Firebase Crashlytics, etc.).
- Third-party services used by us – for example, an external service supporting our career and recruiting options through the Website (e.g., Comeet or Workday), or an external service which allows us to screen short videos on our Website (e.g., YouTube or Vimeo).

Please note that the data collected by the use of Cookies may be linked to and combined with any other data, including Personal Data.

Also note, that Cookie's data is usually collected through third-party services, like Google, Facebook, etc. In those cases, your Personal Data might be transferred to those third parties, which might use it, as a "joint controller" of the data, meaning that the data is also "owned" and processed by them under their terms and conditions. Under those terms and conditions and the direct accounts or subscriptions you have with those third parties, your Personal Data might be linked to other data collected by the relevant third party and processed in its systems, for its purposes, and under its management. For example, suppose you have a Facebook account, the Personal Data collected through Facebook's Cookies in Our Website might be linked to other data Facebook collects and might be used by Facebook per the independent agreements between you and Facebook.

### **What Are Your Choices Regarding Cookies?**

If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser, or use the designated Cookies Bar in the Website. Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use all of the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

For the Chrome web browser, please visit [this page from Google](#)

For the Internet Explorer web browser, please visit [this page from Microsoft](#)

For the Firefox web browser, please visit [this page from Mozilla](#)

For the Safari web browser, please visit [this page from Apple](#)

For any other web browser, please visit your web browser's official web pages.

### **Where Can You Find More Information About Cookies?**

You can learn more about cookies and the following third-party websites:

- All About Cookies: <http://www.allaboutcookies.org/>
- Network Advertising Initiative <http://www.networkadvertising.org/>

### **SHARING DATA WITH THIRD PARTIES**

We do **not** share any **Personal Data** collected from you with third parties or any of our partners except in the following events:

- **Legal Requirement:** We will share your information in this situation only if we are required to do so to comply with any applicable law, regulation, legal process, or governmental request (e.g., to comply with a court injunction, comply with tax authorities, etc.);
- **Policy Enforcement:** We will share your information, solely to the extent needed to (i) enforce our policies and agreements; or (ii) to investigate any potential violations thereof, including without limitations, detect, prevent, or take action regarding illegal activities or other wrongdoings, suspected fraud or security issues;

- **Company's Rights**: We will share your information to establish or exercise our rights, to prevent harm to our rights, property, or safety, and to defend ourselves against legal claims when necessary, subject to applicable law;
- **Third Party Rights**: We will share your information, solely to the extent needed to prevent harm to the rights of our users, yourself, or any third party's rights, property, or safety;
- **Service Providers** – we share your information with third parties that perform services on our behalf (e.g. customer service, tracking cookies, servers, service functionality, marketing, and support, etc.) these third parties may be located in different jurisdictions.
- **Corporate Transaction** - we may share your information in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, consolidation or asset sale). In the event of the above, our affiliated companies or acquiring company will assume the rights and obligations as described in this Privacy Policy;
- **Authorized Disclosures** - we may disclose your information to third parties when you consent to a particular disclosure. Please note that once we share your information with another company, that information becomes subject to the other company's privacy practices.

### **YOUR DATA SUBJECTS' RIGHTS UNDER PRIVACY PROTECTION LAWS**

Under EU law, EU residents and individuals have certain rights to apply to us to provide information or make amendments to how we process data relating to them. Those rights might include:

- right to access your Personal Data - you can ask us to confirm whether or not we have and use your Personal Data, and if so, you can ask for a copy of your data;
- right to correct your Personal Data - you can ask us to correct any of your Personal Data that is incorrect, after verifying the accuracy of the data first;
- right to erase your Personal Data - you can ask us to erase your Personal Data if you think we no longer need to use it for the purpose we collected it from you. You can also ask for such erasure in any case in which the process of your data was based on your consent, or where we have used it unlawfully, or where we are subject to a legal obligation to erase your Personal Data. any request for such erasure will be subject to our obligations under the law (e.g., our obligation to keep some records for tax or customs purposes);
- right to restrict our use in your Personal Data - you can ask us to restrict our use of your Personal Data in certain circumstances;
- right to object to how we use your Personal Data - you can object to any use of your Personal Data which we have justified by our legitimate interest if you believe your fundamental rights and freedoms to data protection outweigh our legitimate interest in using the information;
- you can always require us to refrain from using your data for direct marketing purposes, or withdraw any Consent you have provided us with, if you wish to do so;
- you can ask us to transfer your information to another organization or provide you with a copy of your Personal Data (Portability Right).

We may not always be able to do what you have asked. Also, not all those rights apply in every jurisdiction. Yet, we encourage you to contact us with any such request, and we will be happy to assist you.

You have the right to lodge a complaint at any time before the relevant supervisory authority for data protection issues. However, we will appreciate the chance to deal with your concerns before you approach the authorities, so please feel free to contact us in the first instance.

## **DATA RETENTION**

The criteria used by us to determine the retention of Personal Data of our users are as follows:

- **The type of personal data and purpose of collection** - unless otherwise specified, we retain data as long as it is necessary and relevant for us to achieve the purposes for which the Personal Data was collected (i.e., as explained broadly in the chart above). For instance, marketing data and other data collected under your consent, shall be retained until you will ask us to delete it, or until it will no longer serve the purpose for which it was collected for initially.
- **Compliance with our legal obligations** – we are required to retain certain types of data in order to comply with our obligations under applicable laws. For example, we may retain certain types of personal data in the event we are required to do so subject to a binding legal request or a court order.
- **Dispute, claims and legal proceedings** - if you have a dispute with us, we may retain certain types of personal as necessary and applicable to your claims, including any legal proceedings between us, until such dispute was resolved, and following, if we find it necessary, in accordance with applicable statutory limitation periods. In addition, in the event you request to exercise your rights, we will maintain the applicable correspondence for as long as needed to demonstrate compliance, and usually in accordance with applicable statutory limitation periods.

## **SECURITY**

We use physical, technical, and administrative security measures for the services that we believe comply with applicable laws and industry standards to prevent your information from being accessed without the proper authorization, improperly used or disclosed, unlawfully destructed or accidentally lost.

However, unfortunately, the transmission of information via the internet and online data processing cannot be 100% secure. As such, although we will do our best to protect your Personal Data, we cannot guarantee the security of data transmitted via the Website and any transmission of your data shall be done at your own risk.



### **DATA PROCESSING LOCATION**

We may store or process your Personal Data in a variety of countries, including the United States.

Any transfer of data that originates in the European Union ("EU") to a country outside of the European Economic Area (EEA), shall be made in compliance with the provisions of chapter 5 of the GDPR, e.g.:

- transfer to a country that is recognized as providing an adequate level of legal protection;
- transfer under a proper agreement containing the Standard Contractual Clauses published and authorized by the relevant EU authorities;
- where we can be satisfied that alternative arrangements are in place to protect your privacy rights through the use of any other mechanism under the GDPR.

It is important to note that we are headquartered in Israel, a country that the European Data Protection Board considers offering an adequate level of Personal Data protection regulation.

### **LINKS TO OTHER SITES**

Our Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy notice of every Website you visit.

### **CHILDREN**

Our Website is not directed, nor is it intended for use by children (the phrase "child" shall mean an individual that is under age defined by applicable law which concerning the European Economic Area ("EEA") is under the age of 16 and with respect to the U.S.A, under the age of 13) and we do not knowingly process a child's information. We will discard any information that we receive from a user who is considered a "child" immediately upon our discovery that such a user shared information. Please contact us if you have reason to believe that a child has shared any information with us.