

## **PRIVACY NOTICE**

We, at Zadara., are committed to respecting our customers' and their users' privacy, protecting their personal data and making sure it is used properly by us. This privacy notice explains the principals of our privacy practices for processing personal data on our website and services: what data we collect, how we collect it, what we do with it, how we protect it, and your rights regarding your user's information.

- We collect both personal data (which may identify an individual) and non-personal data (which does not identify an individual) about our customer's users, when they enter our website and/or while they are using our services.
- We use such information for the main purposes of provision of our service, to communicate with our customer and improve its usage experience, and to comply with applicable law. We maintain technical and administrative security measures to protect our customers and their user's information.
- We use and/or transfer personal data and non-personal data in or outside the EEA, whether by ourselves or by third party's acting on our behalf (who are committed for the security of the information).
- We have no direct relationship with our customer's users. Our customers are the controller of their user's data, and are responsible to address any of their user's request. Our customers may request to access, receive a copy of, update, amend, delete or limit the use of the User's personal data by sending us a request.
- We may keep user's personal data as long as the customer is using our service, and unless restricted by applicable law, we may retain non-personal data indefinitely.

For further information, you can access our full privacy policy, where you can inter alia find specific examples of why and how we use your users' personal data. Our full privacy policy is available below. If you have further questions please contact [support@zadara.com](mailto:support@zadara.com).

## FULL PRIVACY POLICY

This Privacy Policy is effective August 20 2019.

Welcome to Zadara's website ("**Zadara**"). Your privacy is important to us. For that reason, we have adopted this Privacy Policy to explain our information gathering and use practices regarding the information we collect from individuals who visit the Website and/or individuals who register to use the Services on behalf of the Customer, as further described in our Term of Service, and how we use and/or otherwise process such information. This Privacy Policy describes our privacy practices in relation to the use of the Website and the Services we offer.

Following your first use of the Services or when you create an account, order services, request information, communicate with us, or subscribe to emailing lists through the Website, you indicate that you have read this Privacy Policy. Please read carefully the terms of this Privacy Policy. If you have further questions or concerns regarding this Privacy Policy, please contact us at: [support@zadara.com](mailto:support@zadara.com). This Privacy Policy may change over time, so you should check back for updates.

We don't provide our Services for purchase by children. If you're under 18, you may use our Services only with the involvement of a parent or guardian.

### 1. Definition

Terms which are defined in this Privacy Policy shall have the same meaning as described in the Terms of Services (which can be viewed at: <https://www.zadara.com>), unless otherwise defined herein.

- 1.1. "**Customer**" means any company, enterprise, business or other organization that is interested in purchasing and/or using the Services (including, without limitations, for a trial period).
- 1.2. "**Customer Data**" means the Personal Data that Customer chooses to store through the Services in the course of using the Services (including, without limitation, during the trial period).
- 1.3. "**Data Protection Laws**" means the GDPR, the laws in the EEA implementing or supplementing the GDPR in the relevant countries and any other data protection laws applicable to Zadara.
- 1.4. "**Data Subject**", "**Controller**" and "**Processor**" and "**Supervisory Authority**" shall have the meaning ascribed to such terms in the applicable Data Protection Laws, mutatis mutandis.
- 1.5. "**GDPR**" means General Data Protection Regulation (EU) 2016/679 (as may be amended, replaced or superseded from time to time).
- 1.6. "**Information**" shall mean Personal Data and Non-Personal Data, together.
- 1.7. "**Non-Personal Data**" means any information, data or content which we collect about your use of the Website and/or Services which is anonymous and/or does not personally identify you and/or reveal your specific identity as an individual, and/or cannot be attributed to you (such as device information, clicks, time spent on the Website etc.).

- 1.8. "**Personal Data**" shall have the meaning ascribed to it under the applicable Data Protection Laws (such as email address, phone number, name etc.).
- 1.9. "**Services**" shall have the meaning ascribed to it in our Terms of Services, available at: <https://www.zadara.com>.
- 1.10. "**You**" or "**User**" means the individual who is using the Website and/or the Services on behalf of the Customer.
- 1.11. "**Website**" – Our website which is located at: <https://www.zadara.com>.
- 1.12. "**Website Data**" – means any Personal Data Customer submits and/or otherwise upload to the Website (via its Users) in order to contact us for any purpose.

## **2. Information Collected**

We collect and/or process two types of data and information: Personal Data and Non-Personal Data. As for Personal Data, the collection is further divided to two parts: Website Data and Customer Data. In any event, the collection of Information commences on your first use of the Website and/or the Services.

### **2.1. Collection and or Processing of Personal Data:**

**Website Data that You Provide through the Website.** When visiting our Website or create an account, we may require you to provide us with Personal Data, or you may choose to give us Personal Data for many reasons, such as: contact information (when registering on our Website to obtain our Services or inquiring about becoming a supplier or business partner), facts about yourself, your business, profession and product preferences. In some jurisdictions You have no legal obligation to provide us with any Personal Data (whether in the Website and/or the Services), and the provision of it is solely based on your free will. However, you are aware that without the provision Personal Data, we will not be able to reply and/or otherwise address your query in the Website and/or open your account for the use of the Services. Personal Data will be stored in our database(s).

**Customer Data that you upload through the Services.** In providing the Services to Customers, we may process on behalf of Customers Personal Data they choose to upload or otherwise submit to our Services. The processing of Personal Data included in the Customer Data is governed by the applicable agreement between us and the Customer.

- 2.2. **Collection of Non-Personal Data.** Our web servers may automatically collect website usage information from you when you visit our Website. Website usage information informs us about how visitors and subscribers use and navigate the Website, including the number and frequency of users to each web page, their IP address, and the length of their stays. See further information below under "Information Gathering Tools".

## **3. How Do We Collect Information**

- 3.1. **The methods we use to collect Information.** We collect Website Data through your entry, connection, access and/or use of the Website and/or otherwise provided to us voluntarily. Further, Customer Data may uploaded by the Customer through the Services, in the course of using the Services, and we may generate Non-Personal

Data by using technological tools as set forth below.

3.2. **Information Gathering Tools.** We use commonly-used information-gathering tools, such as cookies and web beacons, to collect information as you navigate our Website (“**Information Gathering Tools**”). This section describes the types of Information Gathering Tools used on our Website and how this information may be used.

- **Cookies.** We use cookies to make interactions with the Website easy and meaningful. When you visit the Website, our servers send a cookie to your computer. Standing alone, cookies do not personally identify you; they merely recognize your Web browser. Unless you choose to identify yourself to us, either by responding to a promotional offer, opening an account, or filling out a Web form, you remain anonymous to us. We use cookies that are session-based and persistent-based. Session cookies exist only during one session. They disappear from your computer when you close your browser software or turn off your computer. Persistent cookies remain on your computer after you close your browser or turn off your computer. Please note that if you disable your Web browser’s ability to accept cookies, you will be able to navigate our Website, but some features of the Services may not work.
- **Web Beacons.** We use web beacons alone or in conjunction with cookies to compile information about Customers and visitors’ usage of the Website and interaction with emails from us. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular web site tied to the web beacon, and a description of a web site tied to the web beacon. For example, we may place web beacons in marketing emails that notify us when you click on a link in the email that directs you to our Website. We use web beacons to operate and improve the Website and email communications.
- **IP Addresses.** When you visit the Website, we collect your Internet Protocol (“**IP**”) addresses to track and aggregate Non-Personal Data. For example, we use IP addresses to monitor the regions from which customers navigate the Website. We also collect IP addresses from Customers when they log into the Services.

3.3. Information collected by cookies and similar technologies are treated as Non-Personal Data, except to the extent under local law IP addresses (or like identifiers) are otherwise considered Personal Data.

#### 4. **How do we Use the Information Collected**

##### 4.1. **We use Website Data to:**

- Register and administer your account(s) and deliver Services and support;
- Prevent and detect security threats or other malicious activity in the Services;
- Send communications to you, such as service information, account summaries, promotional offers, and surveys;
- Protect our rights and the rights of others, including preventing fraud and other illegal activities;
- Contact you as you have requested related to your use of the Services, or other inquiry;

- Protect the security or integrity of our business, or our products or Services; or
- Otherwise, as disclosed to you at the point of collection.

**4.2. We process Customer Data to:**

- Provide the Services to Customers in accordance with the applicable Customer agreements, and to carry our obligations arising from our agreement(s) with the Customer.
- Comply with our legal obligations and in order to be able to protect our rights and legitimate interests.

**4.3. We use Non-Personal Data to:**

- Enhance the User's experience on the Website;
- Create statistical information and learn about the preferences of Users and general trends on the Website (e.g. understand which features are more popular than others);
- Keep the Website safe and secured and for prevention of fraud.

**4.4. For Users in the EU:**

- **As for Website Data:** We only process Personal Data where we have a legal basis to do so. The legal basis will depend on the reason or reasons we collected and need to use the Website Data. The legal basis for processing Website Data will be: (a) to comply with our contractual obligations with the Customer with respect to the provision of the Services and/or to address your query in the Website; (b) there is a legitimate interest to process the Website Data (for example, to identify and prevent abuse of the Website or the Services, to improve the Services); (c) To comply with a legal obligation that apply to us (for example, to disclose information to authorities).
- **As for Customer Data:** The Customer Data that we store is owned and controlled by the Customer, who is the Controller of such information, and we only act as a Processor on behalf of the Customer. We will process the Customer Data in accordance with the provisions of our Data Processing Addendum to be entered into between Customer and us. The Customer's initiates the collection of Customer Data, determines from whom to collect such data, defines what data to collect and how to use the collected Customer Data. As such, the lawful basis for processing of Customer Data has been determined exclusively by the Customer. For further queries with respect to the Customer Data and the lawful basis of its processing, please review the Customer's privacy policies and/or contact the Customer.

**4.5. For Non-EU Users:** by entering, connecting to, accessing or using the Website and/or the Services, you hereby provide your informed consent to the collection, use and process of your Personal Data incorporated in the Website Data and/or the Customer Data (including the transfer of your Personal Data to third parties) for the purposes and the terms as specified in this Privacy Policy.

**5. Sharing of Information collected**

We respect your privacy and will not disclose, share, rent, or sell your Personal Data to any third party, other than as permitted under this Privacy Policy. We may share Information

with third parties, as set forth below:

- 5.1. **Service Providers.** We may share Information with our contracted service providers (such as cloud vendors, advertisers, partners, billing service providers, companies that provide analysis and processing activities, messaging services etc.) so that these service providers can provide services on our behalf. Unless described in this Privacy Policy, we do not share, sell, rent, or trade any information with third parties for their promotional purposes.
- 5.2. **Affiliates.** To facilitate our global operations, in order to help us improve the content of the Website and to provide you with the Services requested, we may transfer the collected Information to our affiliates worldwide, provided that the receiving entity will comply with this Privacy Policy.
- 5.3. **Business Transfers:** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, your Personal Data and other Information may be transferred to a successor or affiliate as part of that transaction along with other assets.
- 5.4. **Official Authorities:** We may need to disclose Personal Data in response to lawful requests by public authorities or law enforcement officials, including meeting national security or law enforcement requirements. We cooperate with government and law enforcement officials to enforce and comply with the law.

## 6. International transfer of Information collected.

To facilitate our global operations, we may transfer and process your Personal Data from around the world, according to the terms herein:

- 6.1. **Customer Data:** As an integral part of the Services, each Customer independently chooses from Zadara's data center's the data center in which Customer Data will be stored and processed. We are committed to protecting Personal Data and will take appropriate steps to ensure that Personal Data is processed and stored securely and in accordance with applicable Privacy Law. It is Customer's sole and exclusive liability and responsibility to ensure that its decision with respect to Customer's Data location worldwide (including, without limitations, to any onward transfer) is in full compliance with Data Protection Laws, and that Data Subjects' rights under such Data Protection Laws are not violated and/or otherwise offended.
- 6.2. **Website Data:**

For EU Users: Please note that Website Data might be stored on secured servers located in countries outside the EEA. In order to keep your Personal Data safe, we apply strict safeguards when transferring it outside the EEA, which may include the following: (a) Transferring Website Data to countries approved by the European Commission as having adequate data protection laws; (b) 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 Website Data; (c) Transferring your Personal Data to organizations that are Privacy Shield Scheme certified, as approved by the European Commission.

For Non-EU Users: Website Data is stored on secured servers located in countries outside of your jurisdiction, which may not be considered to offer an adequate level

of protection as exists under your local laws. By submitting your Personal Data through the Website and/or in the Services, you hereby acknowledge, and provide your informed consent to such transfer, storing and/or processing of your Personal Data in such locations.

## 7. Your Rights

7.1. Your rights with respect to Customer Data: As stated above, we have no control over what types of Personal Data the Customer chooses to store through the Services (including whether or not it includes Personal Data). We do not collect Personal Data from Data Subjects whose Personal Data may or may not be incorporated in the Customer Data, and have no contact with them. Therefore, we are not able to communicate with any Data Subjects and/or grant them any rights. As a result, when a Customer or prospective customer shares Personal Data, the Customer or prospective customer is solely responsible for satisfying all legal obligations owed directly to the Data Subject under applicable Data Protection Laws. We are not responsible for Customers' or prospective customers' privacy policies or practices or for the Customers' or prospective customers' compliance with such policies or practices. We do not review, comment upon, or monitor Customers' or prospective customers' privacy policies or their compliance with such policies. We also do not review instructions or authorizations provided to us to determine whether the instructions or authorizations are in compliance with, or conflict with, the terms of a Customer's or prospective customer's published privacy policy or of any notice provided to Data Subjects. Customers and prospective customers are responsible for providing instructions and authorizations that comply with their policies, notices, and applicable laws. If you wish execute your rights regarding Customer Data, please contact the Customer.

7.2. Your rights with respect to Website Data: We hereby inform you of the following rights with respect to the processing of your Personal Data incorporated in the Website Data. Please note that these rights may differ, dependent on whether you are EU User or not:

- You may have the right to request a review of your Personal Data we process.
- You have the right have your Personal Data rectified to the extent it is incorrect, incomplete or not processed in compliance with applicable Data Protection Laws;
- You may be entitled to require that we erase certain part of your Personal Data if its processing is not justified;
- You may have the right of data portability of some of your Personal Data to other controllers.
- In some circumstances, you have the right to object to or withdraw consent (where the legal basis for processing is consent).
- Under certain circumstances, you may have the right to object to the processing of your Personal Data due to your particular situation.
- You have the right to lodge a complaint before the applicable Supervisory Authority of your jurisdiction.

If you wish to exercise any of your rights, please contact us at: [Support@zadara.com](mailto:Support@zadara.com). We will act in accordance with the applicable Data Protection Laws, in order to comply with your request.

## 8. Protecting Your Information

- 8.1. We are committed to protecting the security of Personal Data. We use a variety of administrative, technical, and physical security technologies and procedures to help protect your Personal Data from unauthorized access, use, or disclosure. We will not give, sell, rent, share, or trade any Personal Data about you to third parties or provide your Personal Data, including your name or electronic mail address, to third parties except as provided herein, or required by law, subpoena or court order. While we strive to protect your Personal Data, we cannot ensure or warrant that the Personal Data or private communications you transmit to us will always remain private and will not be illegally accessed, and accordingly you assume all risk associated therewith and agree that we will not under any circumstances be liable to you in respect thereof.
- 8.2. You may access your account information and our Services only through the use of an individual user ID and password. To protect the confidentiality of Personal Data, you must keep your password confidential and not disclose it to any other person. Please advise us immediately if you believe your password has been misused. In addition, always logout and close your browser when you finish your session. Please note that we will never ask you to disclose your password in an unsolicited phone call or email.

If you have any questions about the security of your Personal Data, you can contact us at [Support@zadara.com](mailto:Support@zadara.com).

## 9. Linked Sites

Our Privacy Policy only covers our Website and Services. Some areas of our Website might contain links to third party sites ("**Linked Sites**"). We do not control the Linked Sites and we are not responsible for their privacy practices. We suggest that you check the privacy policies of these sites before providing any Personal Data to them.

## 10. Retention

We retain different types of Information for different periods, depending on the purposes for processing the Information, our legitimate business purposes as well as pursuant to legal requirements under the applicable law.

- 10.1. We will retain certain Website Data for as long as your account is active and/or as is needed to provide you the Services (unless we are legally required to delete it, or if you seek to exercise your right to delete it). If you wish to request that we no longer use your information to provide you Services, contact us by electronically mailing our Customer Support at: [support@zadara.com](mailto:support@zadara.com). We will retain and use your registration information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.
- 10.2. As for the Customer Data, since the Customer is the Controller of the preservation and deletion of the Customer Data, the Services will allow you to delete the Customer Data following termination of the Services or at any time prior to such time, at Customer's discretion.
- 10.3. Unless otherwise restricted under applicable law, Non-Personal Data will be retained indefinitely.



## **11. Opt-out**

To the extent you subscribed to our marketing mailing list, you may opt-out of having your Personal Data: (a) used for purposes not directly related to the use of the Website and/or Services, or (b) disclosure of Personal Data to third parties not identified at the time of collection or subsequently authorized. You may opt-out of receiving promotional materials by replying with unsubscribe in the subject line of the electronic mail or electronic mailing our Customer Support at [support@zadara.com](mailto:support@zadara.com). This opt-out only applies to Personal Data collected on our Website, and does not apply to any use and/or process of Information in or by Linked Sites, third party publishers, advertisers, ad networks or other third parties.

## **12. Changes to this Privacy Protection Policy**

We reserve the right to change this Privacy Policy. We will provide notification of the material changes to this Privacy Policy through the Website at least thirty (30) business days prior to the change taking effect, and your continued use of the Website and/or the Services on or after the "last revised" date will constitute acceptance of, and agreement to be bound by, those changes.

## **13. Governing Law**

This Privacy Policy shall be governed by and construed: (i) with respect to Customers located outside the EEA, in accordance with the laws of the state of New York, excluding its choice of law principals, and disputes arising in connection with this Privacy Policy shall be subject to the exclusive jurisdiction of the federal courts of the United States or the courts of the State of New York; (ii) with respect to Customers located within the EEA, in accordance with the laws of the state of Israel, excluding its choice of law principals, and disputes shall be subject to the exclusive jurisdiction of the competent courts in Israel.

## **14. Contacting Us**

Questions regarding this Privacy Policy or the information practices of the Website should be directed to: [support@zadara.com](mailto:support@zadara.com).