

**PERSONETICS WEBSITE PRIVACY AND  
INFORMATION SECURITY POLICY**

In order to ensure transparency and give you more control over your personal information, this Privacy Policy notice describes how Personetics Technologies Ltd. (collectively with its affiliates, "Personetics" "we", "our" or "us") handles and protects the information it collects or receives from the users ("users" or "you") such as in the following use cases:

- (i) When you browse or visit our website, <https://www.personetics.com> ("Website")
- (ii) When you make use of, or interact with, our Website
- (iii) When you attend a marketing event and provide us with your personal data
- (iv) When you interact with us on our social media profiles (e.g., Twitter, LinkedIn)

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest of user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to personal data. "Personal data" or "personal information" means any information that can be used, alone or together with other data, to uniquely identify any living human being. *Please note that this is a master privacy policy and some of its provisions only apply to individuals in certain jurisdictions. For example, the legal basis in the table below is only relevant for GDPR-protected individuals.*

**Important note:** Nothing in this Privacy Policy is intended to limit in any way your statutory right, including your rights to a remedy or means of enforcement.

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**1. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED**

Specific personal data we collect	Why is the personal data collected and for what purposes?	Legal basis	Retention period	Consequences of not providing the personal data
<p>Cookies, analytic tools and log files.</p> <p>For more information, please read our cookies policy <a href="#">Personetics Cookie Policy 2020</a></p>	<p>To properly operate our services, to improve the quality and functionality of our services, to enhance your experience, to create new services, including customized services, to change or cancel existing content or services and for other internal and statistical purposes</p>	<p>Consent</p> <p>Legitimate interest (e.g. essential cookies)</p>	<p>For more information, please read our cookies policy <a href="#">Personetics Cookie Policy 2020</a></p>	<p>Certain Website features may not be available</p> <p>Read more about the purposes of each cookie here <a href="#">Personetics Cookie Policy 2020</a></p>
<p>Any of the following</p> <ul style="list-style-type: none"> <li>• First Name</li> <li>• Last Name</li> <li>• Email address</li> <li>• Phone Number</li> <li>• Job Title</li> <li>• Company name</li> <li>• Country</li> <li>• Social media profiles</li> </ul>	<ul style="list-style-type: none"> <li>• To allow you to download eBook</li> <li>• To allow you to download Reports</li> <li>• To allow you to download the Case Study</li> <li>• To allow you to register for a Webinar</li> <li>• To allow you to apply for a job via a website submission</li> <li>• When you contact us (e.g., customer support, to schedule a meeting, etc.)</li> <li>• When you attend a marketing event and provide personal data</li> <li>• When you interact with us on our social media profiles (e.g., Twitter, LinkedIn)</li> <li>• When you make use of, or interact with, our Website</li> </ul>	<p>Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Legitimate interest (e.g., to allow you to download the requested material)</p>	<p>No longer than 7 years</p>	<ul style="list-style-type: none"> <li>• We cannot allow you to download eBook</li> <li>• We cannot allow you to download Reports</li> <li>• We cannot allow you to download the Case Study</li> <li>• We cannot allow you to register for a Webinar</li> <li>• We cannot allow you to apply for a job via a website submission</li> <li>• We cannot allow you to contact us (e.g., customer support, to schedule a meeting, etc.)</li> <li>• We cannot allow you attend a marketing event and provide personal data</li> <li>• We cannot allow you interact with us on</li> </ul>

	<ul style="list-style-type: none"> <li>When you request that we send you marketing communications</li> </ul>			<p>our social media profiles (e.g., Twitter, LinkedIn)</p> <ul style="list-style-type: none"> <li>We cannot allow you make use of, or interact with, our Website</li> <li>We cannot allow you request that we send you marketing communications</li> </ul>
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Finally, please note that some of the abovementioned personal data will be used for detecting, taking steps to prevent, and prosecution of fraud or other illegal activity, to identify and repair errors, to conduct audits, and for security purposes. Personal data may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims. In certain cases, we may or will anonymize or de-identify your personal data. "Anonymous Information" means information which does not enable identification of an individual user, such as aggregated information about the use of our services. We may use Anonymous Information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them).

## 2. HOW WE PROTECT AND RETAIN YOUR PERSONAL DATA

**Security.** Personetics implemented appropriate technical information security systems and procedures to secure your **Personal Information** which you may upload to our website, **for example** in connection with the personalized video services.

While such systems and procedures reduce the risk of security breaches, they do not provide absolute security. Therefore, we cannot guarantee that our systems will be immune from any wrongdoings, malfunctions, unlawful interceptions or unauthorized access to the information stored in them and to other information security risks. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.

2.1. **Retention of your personal data.** In addition to the retention periods mentioned above, in some circumstances we may store your personal data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your personal data or dealings. We have an internal data retention policy to ensure that we do not retain your personal data perpetually. Regarding retention of cookies, you can read more in our cookie policy [Personetics Cookie Policy 2020](#).

## 3. Sharing Personal Information

In addition to the recipients described above, we may share your personal data as follows:

- 3.1. With our business partners with whom we jointly offer products or services. We may also share personal data with our affiliated companies.
- 3.2. To the extent necessary, with regulators, courts or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- 3.3. If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your personal data to such third party (whether actual or potential) in connection with the foregoing events;
- 3.4. In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your personal data in connection with the foregoing events; and/or
- 3.5. Where you have provided your consent to us sharing or transferring your personal data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality).

## 4. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL DATA

4.1. Storage:

- 4.1.1. AWS - NV region
- 4.1.2. AWS - Ireland region
- 4.1.3. Azure - North Europe/West Europe

4.2. **Access from Israel:** Access from Israel is covered by the European Commission's Adequacy Decision regarding Israel. You can read more here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en).

4.3. **Internal transfers:** Since we operate globally, your personal information may be shared within our network of offices, affiliates and agents around the world, including across borders and from your country or jurisdiction to other countries or jurisdictions around the world. All such entities are governed by this Privacy Policy and/or are bound by the appropriate confidentiality and data transfer agreements which contractually obliges each member to ensure that personal data receives an adequate and consistent level of protection wherever it is transferred to.

## 5. YOUR PRIVACY RIGHTS

5.1. **Rights:** The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals

(some of which only apply to individuals protected by the GDPR):

- You have a right to access personal data held about you. Your right of access may normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
- You have the right to request that we rectify any personal data we hold that is inaccurate or misleading;
- You have the right to request the erasure/deletion of your personal data (e.g. from our records). Please note that there may be circumstances in which we are required to retain your personal data, for example for the establishment, exercise or defense of legal claims;
- You have the right to object, to or to request restriction, of the processing;
- You have the right to data portability. This means that you may have the right to receive your personal data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
- You have the right to object to profiling;
- You have the right to withdraw your consent at any time. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations. Also, please note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal;
- You also have a right to request certain details of the basis on which your personal data is transferred outside the European Economic Area, but data transfer agreements and/or other details may need to be partially redacted for reasons of commercial confidentiality;
- You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place of work or place of alleged infringement) at any time or before the relevant institutions in your place of residence. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority and/or relevant institution.

You can exercise your rights by contacting us at [marketing@personetics.com](mailto:marketing@personetics.com). Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

## 6. USE BY CHILDREN

We do not offer our products or services for use by children and, therefore, we do not knowingly collect personal data from, and/or about children under the age of eighteen (18). If you are under the age of eighteen (18), do not provide any personal data to us without involvement of a parent or a guardian. For the purposes of the GDPR, we do not intend to *offer information society services directly to children*. In the event that we become aware that you provide personal data in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at [privacy@personetics.com](mailto:privacy@personetics.com).

## 7. INTERACTION WITH THIRD PARTY PRODUCTS

We enable you to interact with third party websites, mobile software applications and products or services that are not owned or controlled by us (each a “**Third Party Service**”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect personal data from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

## 8. LOG FILES

We use log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us. We use such information to analyze trends, administer the Website, track users’ movement around the Website, and gather demographic information.

## 9. ANALYTIC TOOLS AND TRACKING TECHNOLOGIES

- **Google Analytics.** The Website uses a tool called “**Google Analytics**” to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with personal information we collect. Google’s ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <https://marketingplatform.google.com/about/analytics/terms/us/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.
- We reserve the right to remove or add new analytic tools.

We may share, publish, post, disseminate, transmit or otherwise communicate or make available such information, to suppliers, business partners, sponsors, affiliates and any other third party, at our sole discretion, although we will not

knowingly, or intentionally use the information to reveal your identity without your consent.

## **10. SPECIFIC PROVISIONS APPLICABLE UNDER CALIFORNIA PRIVACY LAW**

### **10.1. Our California Do Not Track Notice:**

We do not collect personally identifiable information about an individual consumer's online activities over time and across third-party web sites or online services?

Third parties do not collect personally identifiable information about an individual consumer's online activities over time and across third-party web sites or online services when a consumer uses your site?

**10.2. Deletion of Content from California Residents:** If you are a California resident under the age of 18 and a registered user, California Business and Professions Code Section 22581 permits you to remove content or personal information you have publicly posted. If you wish to remove such content or personal information and you specify which content or personal information you wish to be removed, we will do so in accordance with applicable law. Please be aware that after removal you may not be able to restore removed content. In addition, such removal does not ensure complete or comprehensive removal of the content or personal information you have posted and that there may be circumstances in which the law does not require us to enable removal of content.

**10.3. Your Choices:** you have certain choices about your personal information. Where you have consented to the processing of your personal information, you may withdraw that consent at any time and prevent further processing by contacting us as described in this Privacy Policy. Even if you opt out, we may still collect and use non-personal information regarding your activities on our services and for other legal purposes as described above. While we cannot guarantee privacy perfection, we will address any issue to the best of our ability as soon as possible. We will process such requests in accordance with applicable laws. To protect your privacy, we will take steps to verify your identity before fulfilling your request.

## **11. Changes to the Privacy Policy**

Personetics can update or amend this Privacy Policy from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy. If we make any substantial changes in the way we use your Personal Information we will make that information available by posting a notice on this Website or by other means.

## **12. Questions or Suggestions**

If you have questions or concerns about our collection, use, or disclosure of your Personal Information or if you want to be deleted from our database or to unsubscribe from receiving all Personetics information, please e-mail us at [marketing@personetics.com](mailto:marketing@personetics.com).

## **13. CONTACT US**

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at [marketing@personetics.com](mailto:marketing@personetics.com).

**Last Updated:** Nov 02, 2020