

**PEPTICOM LTD.**

**WEBSITE PRIVACY POLICY**

**This website is operated by Pepticom Ltd.**

*(All capitalized terms shall have the meanings ascribed to them in the full privacy policy below.)*

Pepticom Ltd.'s privacy policy (the "**Privacy Policy**" or "**Policy**") explains our practices for processing Personal Information on our Website.

We are committed to protecting privacy and processing Personal Information fairly and lawfully in compliance with data protections laws applicable to us. You can access our full Privacy Policy below to help you understand better how we collect and use your Personal Information. The Policy details the types of Personal Information we collect on our Website, how we collect it, what we may use it for, who we may share it with, how long we may keep it for and what are your rights in relation to your Personal Information.

Read this policy and make sure you fully understand our practices in relation to your Personal Information, before you access or use the Website. If you read and fully understand this Privacy Policy, and remain opposed to our practices, you must immediately leave this Website, and avoid or discontinue all use of the Website. If you have further questions or concerns regarding this privacy policy please contact us at: [info@pepticom.com](mailto:info@pepticom.com).

## FULL PRIVACY POLICY

### 1. Definitions

- 1.1. “**Information**” shall mean Non-PII and PII, together.
- 1.2. “**Pepticom**”, “**we**”, “**us**”, “**our**” shall mean Pepticom Ltd.
- 1.3. “**Non-PII**” or “**Anonymized Information**” shall mean any information, in any format or media, which is anonymous and/or does not personally identify you as an individual and/or cannot be attributed to you as an individual (such as your browser type). We may use some electronic tools to collect Non-PII, as detailed in Section 3 below.
- 1.4. “**Personal Information**” or “**PII**” shall mean any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, or as otherwise defined as such in applicable law.
- 1.5. “**Visitor**”, “**you**”, “**yours**” shall mean an individual person who enters our Website.
- 1.6. “**Website**” shall mean the website owned and operated by Pepticom available at <https://pepticom.com/>.

### 2. Collection of Personal Information

- 2.1. General: The collection of PII commences on the first use of the Website. We collect PII for the purposes detailed in Section 4 below.
- 2.2. PII you may provide us: We collect PII from the information you provide us on the Website. In order to submit the “contact us” online form on our Website, you are required to provide your name and email address, and you may also voluntarily provide us your workplace/company, telephone number, role and further details of your choice through the “free text” message box, or to our company email address. These means of communication are intended to allow us to contact you and respond to your inquiries. Please note that at all times, you may choose whether or not to provide or disclose Personal Information and please do not provide any more PII than is needed for us to contact you.
- 2.3. PII we collect or generate: We may use technological tools (detailed in Section 6 below) through which we may collect the following PII: persistent identifiers such as IP addresses and your Geo-location through the use of “cookies”.

### 3. Anonymized Information

- 3.1. In addition to the categories of Personal Information described above, we may also process further anonymized information and data that is not processed by reference to a specific individual. We may collect this Non-PII through the Website in the following ways:
  - 3.1.1. Information that your browser sends (“**Log Data**”). This Log Data may include, (however is not limited to): non-identifying information regarding your device, operating system, internet browser type, screen resolution, language and keyboard settings, internet service provider, etc.

- 3.1.2. We may use automated devices and applications to evaluate usage of our Website. We use these tools to help us improve our Website, performance and user experience.
- 3.1.3. We may also engage third parties to track and analyze data or provide other services on our behalf. For more information, please see Section 7 “*Transfer to Third Parties*” below.

#### 4. **The Legal Basis for Processing Personal Information**

- 4.1. Pepticom process or makes use of PII for one or more of the purposes detailed below in Section 5.
- 4.2. In addition, we will not make any use of PII about you unless there is a legal basis for such use. The legal basis on which Pepticom may be able to process information about are as follows:
  - 4.2.1. you consent to our processing of PII about you for one or more of the purposes listed below;
  - 4.2.2. Processing the information is required in order to take actions based on your request;
  - 4.2.3. Processing the information is necessary in order to fulfill a legal obligation that applies to Pepticom;
  - 4.2.4. Processing the information is required fulfilling legitimate interests of Pepticom or a third party.
- 4.3. It is hereby clarified that the legal bases detailed above are the legal bases for actions to process PII, carried out by us as in accordance with EU General Data Protection Regulation. It is hereby clarified that if the processing of PII about you is subject to other legal systems, then the legal basis for processing this information may differ according to those laws.
- 4.4. In all cases in which PII about you is processed on this legal basis, you may request at any time to receive details about the examination we conducted that led to our determination that specific PII can be processed on this legal basis.

#### 5. **The Purposes for which We Collect and Use Information**

- 5.1. Your PII shall be used by Us for the following purposes:
  - 5.1.1. to provide and operate the Website;
  - 5.1.2. to monitor and analyze use of the Website and study and analyze the functionality of the Website;
  - 5.1.3. to provide on-going customer assistance, technical support and maintain the Website;
  - 5.1.4. to provide service announcements, notices about employment opportunities, promotional messages and to market our services;
  - 5.1.5. to enforce our policies and other contractual arrangements and prevent misuse of the Website;
  - 5.1.6. to comply with court orders and warrants and to take any action in any legal dispute and proceeding;

- 5.1.7. to better understand your needs, both on an aggregated and individualized basis, in order to further develop, customize and improve our Website based on Visitors' preferences, experiences and difficulties;
  - 5.1.8. to communicate with you and contact you to obtain feedback from you regarding the Website;
  - 5.1.9. to disclose or transfer to third party vendors, service providers, contractors or agents who perform functions on our behalf with respect to the Website;
  - 5.1.10. to create aggregated statistical data and other aggregated and/or inferred Non-PII, which we or our business partners may use to provide and improve our Website or our business partner's services; and
  - 5.1.11. as otherwise authorized by you.
- 5.2. We may use your email address, which you provided us to contact you, when necessary, including in order to send you reminders, offers and to provide you information and notices about the Website. At any time, you may choose (opt out) whether your Personal Information is to be used for sending such marketing materials which are not an essential part of the usage of the Website. You may exercise your choice by contacting us at: [info@pepticom.com](mailto:info@pepticom.com).
- 5.3. Your Non-PII shall be used by Us for the same purposes we use Personal Information (where applicable) and in addition for the following purposes:
- 5.3.1. To monitor and analyze your use of the Website for technical administration and troubleshooting of the Website;
  - 5.3.2. For commercial research and further development;
  - 5.3.3. Improving the Website by creating system analytics and statistical data;
  - 5.3.4. Transfer to third party vendors, service providers, contractors who are working on our behalf for storage, process and/or back up purposes;
  - 5.3.5. Compile and aggregate statistical trends; and
  - 5.3.6. For any other legitimate purpose.
- 5.4. You hereby warrant and represent that you will not have claim and/or demand, of any kind, regarding the use of the Non-PII for any legitimate purpose.

## 6. Technological Tools for Collection of Information

- 6.1. We may use analytics tools to help us understand Visitors' behavior on our Website, including by tracking page content, and click/touch, movements, scrolls and keystroke activities. We use Google Analytics. The privacy practices of these tools are subject to their own policies and they may use their own cookies to provide their services. Further information about the privacy policies of these vendors is available, respectively, at:

<https://policies.google.com/privacy>;

Further information about your option to opt-out of these analytics tools is available at: <https://support.google.com/analytics/answer/181881?hl=iw>.

- 6.2. Depending on your computer settings, you may be allowed to refuse the use of such tools (whether in whole or in part). However, this may affect your ability to use the Website, including to access and use certain features.

## **7. Transfer to Third Parties**

- 7.1. We do not sell, rent or lease your Personal Information. You hereby acknowledge and provide your informed consent, that in connection with the purposes set forth in this Privacy Policy, We may share and/or otherwise transfer the Information to other third parties, as follows:
  - 7.1.1. Third party service providers which assist us in the on-going operation of the Website, including (without limitations) for storage or hosting of the Information and/or for the purposes set forth in this Privacy Policy;
  - 7.1.2. In order to comply with any applicable law or legal requests, court orders and warrants including from law enforcement agencies, or when we believe in good faith that disclosure of Information is necessary to prevent imminent physical harm, financial loss or to report suspected illegal activity. In all cases, such Information will only be disclosed in accordance with applicable laws;
  - 7.1.3. To take any action in any case of dispute involving you with respect to your usage of our Website;
  - 7.1.4. To our affiliates and business partners in connection with the Website and our services; and
  - 7.1.5. In connection with a merger, acquisition, reorganization, assignment, consolidation, transfer, change of control, sale, joint venture, or other disposition of all or any portion of our business, assets or stock. We would share Personal Information with third parties if we undergo bankruptcy or liquidation, in the course of such proceedings.
- 7.2. We may need to disclose Personal Information 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.

## **8. Rights regarding Personal Information**

- 8.1. You have the right to review your PII that is stored in our database(s) and may have a right, under applicable law, to request the update, amendment and/or deletion of PII or exercise other rights under applicable law, by contacting us at: [info@pepticom.com](mailto:info@pepticom.com). We will act in accordance with the applicable law, in order to comply with your request.
- 8.2. We may retain certain information as deemed required by us in accordance with applicable laws, or for legitimate business reasons, for the duration as required under the applicable laws. In addition, we may delete any Personal Information pursuant to our policies, as in effect from time to time.
- 8.3. When you ask us to exercise any of your rights under this Policy and the applicable laws, we may need to ask you to provide us certain credentials to make sure that you are who you claim you are, to avoid disclosure to you of Personal

Information related to others and to ask You questions to better understand the nature and scope of Personal Information that you request to access and your legal rights in relation thereto.

- 8.4. We may redact from the Personal Information which we will make available to you, any Personal Information related to others.

## 9. Security

- 9.1. We take the safeguarding of the Information very seriously, and use a variety of methods to try to protect the Information from loss or unauthorized use or access when it is in our possession or control, including reasonable technical and organizational measures that restrict access to the Information. However, we do not promise or guarantee that any Information will be fully protected from unauthorized disclosure or use.
- 9.2. We also regularly monitor our systems for possible vulnerabilities and attacks, and regularly seek new ways and for further enhancing the security of our Website and protection of our Visitors' privacy.
- 9.3. You should take steps to protect against unauthorized access to your passwords, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. In addition, you should take steps to protect against unauthorized access to Personal Information stored on your devices as well as defining limited access rights to such information on a need to know basis.

## 10. Data Retention

- 10.1. We retain different types of Information for different periods, depending on the purposes for processing the Personal Information, our legitimate business purposes as well as pursuant to legal requirements under the applicable law.
- 10.2. We may retain Personal Information for as long as necessary to support the collection and the use purposes under this Policy and for other legitimate business purposes, for example, for storing Personal Information for documentation, cybersecurity management purposes, legal proceedings and tax issues. We may store aggregated Non-PII without time limit.
- 10.3. In any case, as long as you use the Website, we will keep Information about you, unless we are legally required to delete it, or if you exercise your legal rights to delete the information.

11. **Links to Third Party Sites.** The Website may enable interaction with or contain links to other third party websites or applications, for which privacy practices we are not responsible. Please read the terms and conditions and privacy policy of each such third party that you choose to use or interact with.

12. **Children.** The Website is not intended for minors under the age of 18 years and we do not intend to collect Personal Information from anyone we know to be under 18 years. We rely on you to ensure that the data subject must be above the age of 18. If these age requirements are not met, you are required to obtain the consent of the parent or guardian

to provide and process information in accordance with this Privacy Policy; lacking such consent, you may not use the Website.

13. **Changes to the Privacy Policy.** We reserve the right to change this Privacy Policy at our sole discretion. We will inform you of any such change by posting a new Privacy Policy on the Website; the effective date of any change of Privacy Policy will be clearly marked on each new Privacy Policy posted.
14. **Governing Law.** This Privacy Policy shall be governed by and construed in accordance with the laws of the State of Israel, excluding its choice of law principals. Disputes arising in connection with this Privacy Policy shall be subject to the exclusive jurisdiction of the competent courts in Tel-Aviv-Jaffa, Israel.
15. **Contact Us.** If you have any concerns or questions about this Privacy Policy, please contact us at: [info@pepticom.com](mailto:info@pepticom.com).

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