

CAPPITECH REGULATION LTD.
PRIVACY NOTICE

This Privacy Notice applies to Cappitech Regulation Ltd. ("**Company**") website at www.cappitech.com (the "**Website**") and the Cappivate™ Service (the "**Service**"). This Privacy Notice describes the types of information the Company collects from you when you visit the Website and/or use the Service. This Privacy Notice also explains how the Company may process, transfer, store and disclose the information collected, as well as your ability to control certain uses of the collected information. If not otherwise defined herein, capitalized terms have the meaning given to them in the Company's Terms of Service ("**TOS**"), available at the Website. "**You**" means any adult user of the Website or Services, using the Website or Service on behalf of an entity, individual or yourself or any parent or guardian of any minor whom you allow using the Website or Service, and for whom you will be held strictly responsible. Cappitech Regulation Ltd. is the data controller in respect of the processing activities outlined in this Privacy Notice. Our registered office is 2 Hamenofim St., PO Box 12919, Herzliya 4672553, Israel, and our registration number 515328953.

The following key points listed below are presented in further detail throughout this Privacy Notice. These key points do not substitute the full Privacy Notice.

- **Personal Information we collect.** When you register, we collect the information you provide us with for such registration to the Service. We also collect information about your use of the Website and/or Service. If you contact us for questions or complaints, or when you will out any Forms (as defined in the TOS) or documents, we will collect the information related to your inquiry. It is your voluntary decision whether to provide us with any Private Information (as defined below), but if you refuse to provide such information we may not be able to provide you with the Service.
- **Basis for processing your Private Information.** Processing your Personal Information is necessary for the performance of the TOS and the provision of the Service to you. Processing for the purposes of developing and enhancing new services, for analytics and statistical information, for fraud prevention and security and for our recordkeeping and protection of our legal rights – are all necessary for the purposes of legitimate interests that we pursue. Processing your Private Information for marketing purposes is based upon your consent.
- **Use of your Private Information.** We use your Private Information mainly to administer and provide the Service, contact you with administrative information, contact you with marketing offers (if you indicated your desire to receive those), and improve the Website and Service.
- **Sharing your Private Information.** We may share your Private Information with our service providers and subcontractors who assist us with provision of Service and process the Private Information on our behalf and under our instructions as well as with our business partners and affiliates who may offer you products and services, based on your preferences (if you indicated your desire to receive these).
- **International Transfer.** We may use service providers and/or subcontractors located in countries other than your own, and send them your Private Information. We will ensure that these subcontractors and service providers will be subject to non-disclosure and non-use obligations and we shall ensure to have agreements in place with such subcontractors and service providers ensuring the same level of privacy and data protection as set forth in this Privacy Notice. You hereby consent to such international transfer.
- **Security.** We implement industry-standard measures to reduce the risks of unauthorized access or use of Private Information; however, such measures may not provide absolute information security.
- **Your rights.** Subject to applicable law, you may have a right to access, update or delete your Private Information and obtain a copy of the Private Information we have collected about you. You also have the right to object to certain processing, including

the right to object, at any time, to processing your Private Information for marketing purposes.

- **Retention.** We retain information for as long as necessary for the purposes set forth in this Privacy Notice.
- **Changes to the Privacy Notice.** We may change this Privacy Notice from time and shall notify you of such changes.

Collection of (Private) Information

Company may collect, receive and store any information, data and other details submitted, uploaded, posted, transmitted, communicated, shared or exchanged by you through your visits to the Website and/or through your use of the Service, and such other websites owned by the Company or such other third-party sites, accessible or operated through the Website.

Company may also collect information that refers, is related to, or is associated with an identified or identifiable individual or as otherwise may be defined by applicable law ("**Private Information**"). Private Information may include without limitation:

- Your name, e-mail address, contact details and any other information you choose to provide to the Company via the Website, email, Service and/or otherwise;
- Certain types of information which is automatically collected and recorded by the Company whenever you interact with the Company, including by visiting the Website and/or using the Service, including and subject to your consent as may be required by applicable law, location data and certain "traffic data" on its server logs from your browser, such as your IP address, browser type, domain names, access times and referring Website addresses;
- Anonymous demographic information, such as your ZIP code, age, preferences, interests and favorites;
- Information you provide when providing the Company with feedback, subscribing to the Website and/or using the Service or completing Forms and other documents submitted to the Company. This information may include any Private Information.

Use of Private Information

The Company and any of its trusted third-party subcontractors and service providers may monitor, collect, retain and use Private Information as follows:

1. For provision of the Service.
2. For quality control purposes, for optimizing and conducting analyses to improve the Website and Service and developing new service and to diagnose problems with the servers and to personalize the Website and/or Service.
3. To compile statistical information regarding use of the Website and/or the Service ("**Statistical Information**"). Statistical Information is anonymous and aggregated and the Company will not link Statistical Information to any Private Information. The Company may share such Statistical Information with its partners, without restriction, on commercial terms that it determines in its sole discretion.
4. In an aggregated, non-specific format for analytical purposes (as detailed below).
5. To process your inquiries and responding to your requests and provide you with support services.
6. To provide, customize and personalize its Website and/or the Service and to detect and/or prevent fraud.
7. Subject to your consent as may be required under applicable law, the Company may contact you with informational newsletters and promotional materials relating to the Website and Service. The Company may also contact you to conduct surveys for the examination of current or potential services and/or functionalities of the Website and/or Service. You may "opt out" at any time from receiving marketing communication, even if you have previously elected to receive direct marketing communications from the Company. If you prefer to do so, please contact the Company. You will also be given the opportunity to unsubscribe from

commercial messages in any such e-mail or message the Company sends. Please note that the Company reserves the right to send you service-related communications, including service announcements and administrative messages relating to your account, without offering you the opportunity to opt out of receiving them. Should you not wish to receive such communications you may cancel your account.

8. To review the usage and operations of the Website and Service, including without limitation in order to determine the popularity of certain features and review the functionality of the Website and Service.
9. For preventing fraud, protect the security of our Website, and Service, and address any problems with the Website and/or Service.
10. To maintain records (subject to applicable law) and protecting our legal rights.

Disclosure of Information

The Company may share your information, including Private Information, as follows:

Business Partners, Service Providers, Affiliates, and Subcontractors

The Company may disclose information, including Private Information it collects from and/or about you, to its trusted service providers, business partners, affiliates and subcontractors, who may use such information to: (1) help us provide you with the Service; (2) aid in their understanding of how users are using the Website and Service; (3) when you have consented to such disclosure, provide to you targeted offers and advertising on other websites, applications and/or platforms you choose to visit; and (4) those third-parties, including without limitation regulatory agencies or authorities, selected by you.

The Company may use subcontractors and service providers who are located in countries other than your own, and send them information it receives (including Private Information). All of the Company's subcontractors will be subject to non-disclosure and non-use obligations and it shall ensure to have agreements in place with such subcontractors and service providers ensuring the same level of privacy and data protection as set forth in this Privacy Notice. You hereby consent to such international transfer.

Law Enforcement related disclosure

The Company will fully cooperate with any law enforcement authorities, court order, law, regulation, subpoena, or other law enforcement related issues requesting or directing us to disclose the identity, behavior or digital content, of any user, including in the event of any user suspected to have engaged in illegal or infringing behavior. The Company may also share your Private Information with third parties if it believes in good faith that disclosure is appropriate to protect its rights, property or safety (including the enforcement of the Privacy Notice), or to protect the rights, property or safety of third parties. You can request such Private Information as specified herein by emailing us at info@cappitech.com. The Company may also share information in order to comply with legal and/or regulatory obligations, to protect and defend its rights and property and/or with your permission.

How to Access and Limit the Company's Use of Certain Information

You have a right to know what Private Information the Company holds about you and, in some cases, to have such Private Information communicated to you. Subject to the limitations in applicable law, you may request that the Company update, correct or delete inaccurate or outdated Private Information and have the Company suspend the use of Private Information, the accuracy of which you may contest, while the Company verifies the status of that Private Information.

Subject to the limitations in applicable law, you may also be entitled to obtain from the Company the Private Information you provided to it (excluding information that the Company obtained from other sources) in a structured, commonly-used, and machine-readable format,

and may have the right to (request the Company to) transmit such Private Information to another party.

If you wish to exercise any or all of these rights, please contact the Company and let us know that you wish to exercise your right and specify what Private Information you would like to receive, amend, delete and/or transfer, as applicable. The Company reserves the right to ask for reasonable evidence to verify your identity before providing you with any such information, and/or amending or deleting any Private Information and may charge a fee for exercising this right of access, subject to and in accordance with applicable law.

Please note that we may not be able to provide all the information you ask for, for instance if the information includes Private Information about another person. Where we are not able to provide you with the information for which you have asked, we will endeavor to explain the reasoning for this.

The Company shall delete, amend or transfer Private Information provided to it by a user within a reasonable time from the receipt of a written (including via email) request by such user to delete, amend or transfer such collected Private Information, provided however, that we may retain a copy of certain Private Information for audit and record-keeping purposes, as permissible by law, as well as other purposes, permissible under applicable law. The Company may also retain your information in an anonymized form. The Company cannot restore information once it has been deleted. Please note that to ensure that the Company does not collect any further information about you, you should terminate your account with the Company and no longer utilize the Service and/or Website.

You can change your mind at any time about your election to receive marketing communications from us and/or having your Private Information processed for direct marketing purposes. If you do, please notify us by contacting us as detailed in this Privacy Notice. We will process your request as soon as reasonably possible, however it may take a few days for us to update our records before any opt out is effective.

Subject to applicable law, you may have the right to object to the processing of your Private Information, including, for the purpose of direct marketing.

If you are a European Citizen, you may have the right to submit a complaint to the relevant supervisory data protection authority.

Third Party Service

The Website and/or Service may contain links to third party websites or services, which are governed by their own terms of use and privacy policy, which are outside the Company's control and are not covered by this Privacy Notice. If you access other sites using the links provided on the Company's Website and/or the Services, the operators of these other sites may collect information from you which will be used by them in accordance with their own privacy policy that may differ from this one. The Company does not endorse any products or offered by third parties and urges users to exercise caution in using third-party applications and/or services.

Use of Cookies

The Website uses "cookies" (of the Company and of third parties) to help personalize your online experience and verify security, when required. A cookie is a text file that is placed on your hard disk by a web page server.

- A "session cookie" is temporary and will remain on your device until you leave the Website.

- A "persistent" cookie may be used to help save your settings and customizations across visits. It will remain on your device for much longer or until you delete it .
- First-party cookies are placed by us, while third-party cookies may be placed by a third party. We use both first- and third-party cookie.
- Information may also be collected through web beacons, which are small graphic images ("pixel tags"), which usually work together with cookies in order to identify users and user behavior. These may be shared with third parties .

We may use the terms "cookies" to refer to all technologies that we may use to store data in your browser or device or that collect information or help us identify you in the manner described above.

How We Use Cookies

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the web server that you have returned to a specific page. A "persistent" cookie may be used to help save your settings and customizations across visits. For example, if you visit the Website, a cookie helps the Company recall your specific information on subsequent visits. This simplifies the process of recording your Private Information. When you return to the Website, the information you previously provided can be retrieved, so you can easily use the features that you customized.

In addition, a cookie can help personalize your experience.

The specific names and types of the cookies, web beacons, and other similar technologies we use may change from time to time. However, the cookies we use generally fall into one of the following categories:

Type of Cookie we use:

Type of Cookie	Why We Use These Cookies
Necessary	These cookies are necessary in order to allow the Website and Service work correctly. They enable you to access the Website, move around, and access different services, applications, and tools. Examples include remembering previous actions (e.g. entered text) when navigating back to a page in the same session. These cookies cannot be disabled.
Functionality	These cookies remember your settings and preferences and the choices you make (such as language or regional preferences) and help us personalize your experience and offer you enhanced functionality and content.
Security	These cookies can help us identify and prevent security risks. They may be used to store your session information to prevent others from changing your password without your login information.
Performance	These cookies can help us collect information to help us understand how you use our Website, such as whether you have viewed messages or specific pages and how long you spent on each page. This helps us improve the performance of our Service.
Analytics	These cookies help us learn more about which features are popular with our users and how our Service can be improved.
Advertising	These cookies are placed in order to delivery content, including ads relevant and meaningful to you and your interests. They may also be used to deliver targeted advertising or to limit the number of times you see an advertisement. This can help us track how efficient advertising campaigns are, both for our own Service and for other websites.

How to Adjust Your Preferences

You have the ability to accept or decline cookies. Most web browsers are initially configured to accept cookies, but you can change this setting so your browser either refuses all cookies or informs you when a cookie is being sent. In addition, you are free to delete any existing cookies at any time. If you choose to disable or remove cookies, some features of the Website and/or Service may not function properly.

Security of your Private Information

The Company makes efforts to follow generally accepted industry standards to protect the Private Information submitted to us, both during transmission and once received by it.. However, no method of transmission over the Internet, or method of electronic storage is 100% secure. Therefore, while the Company strives to use commercially acceptable means to protect your Private Information, it cannot guarantee its absolute security. You agree that the Company shall not be liable in any way to any damage whatsoever that may result of any such third party behavior.

Data Retention

The Company retains information as necessary for the purposes set forth above. The Company may delete information from its systems, without notice to you, once it deems it is no longer necessary for the purposes set forth above.

Children

The Company does not knowingly collect personally-identifiable information from children under the age of sixteen (16). In the event that you become aware that an individual under the age of sixteen (16) has enrolled without parental permission, please advise us immediately.

Changes to this Notice

When visiting the Website or access the Service, you shall be asked to accept the terms of this Privacy Notice. If you do not agree with the terms hereof, please do not use the Website and/or Service. The Company may update this Privacy Notice from time to time – in which case, the Company shall notify you of such changes.

Contact Information

The Company welcomes your comments regarding this Privacy Notice. If you believe that Company has not adhered to this Privacy Notice, or if you wish for the Company to amend or delete your Private Information, please contact the Company at 2 HaMenofim St., SeaViewe Building A, PO Box 12919, Herzliya 4672553, Israel or by electronic mail at: info@cappitech.com and the Company will use commercially reasonable efforts to attend to your comment, as detailed in this Privacy Notice.

Miscellaneous

This Privacy Notice shall be governed exclusively by the laws of the State of Israel, without reference to any conflict of laws principles. Any claim or dispute arising hereunder shall be decided exclusively by a court of competent jurisdiction located in Tel Aviv, Israel.
