

**CAPPITECH REGULATION LTD.**  
**PRIVACY POLICY**

This Privacy Policy applies to Cappitech Regulation Ltd. ("**Company**") Terms of Service (the "**TOS**") published in Company's website at [www.cappitech.com](http://www.cappitech.com) (the "**Website**") in connection with the Cappitech's website or with Cappivate™ Service (as defined in the TOS) (the "**Service**"), and governs data collection and usage therein and in connection thereto. By accessing, browsing, using, or otherwise submitting information in connection with the Service or during using the Company's website, you acknowledge and consent to the practices outlined in this Privacy Policy and the collection and use of information by the Company subject to the terms set forth below.

**Collection of Private Information/Data**

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 using the Service, and such other websites owned by the Company or such other third party sites, accessible or operated through the Website (collectively "**Private Information**"). Private Information may include without limitation:

- Your name, e-mail address, contact details and any other information you choose to provide on or via the Website and/or email and/or the *Service*;
- Certain types of information which is automatically received, collected and recorded by Company whenever you interact with the Company by visiting the Website and/or using the Service, including 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, which is not unique to you, such as your ZIP code, age, gender, preferences, interests and favorites;
- Information you provide when providing the Company with feedback, subscribing to the Website and/or using the Services or completing forms and Forms (as defined in the TOS). This information may include any personal information and/or identification information or other personally sensitive data.

**Use of Private Information**

Company may monitor, collect, retain and use any of the Private Information as follows:

1. Using the traffic data collected by Company for quality control reasons by way of helping diagnosis of problems with its servers.
2. Producing statistics and statistical information regarding use of the Website and/or the Service and conveying such statistic information to third parties according to Company's discretion. No identifying details shall be provided to any third parties, subject to the exceptions specified herein.
3. Processing your inquiries and responding to your requests.
4. The Company may use the Private Information to provide, customize and personalize its Website and/or the Service and to detect and/or prevent fraud. The Company may also use such information for promotion purposes, such as to offer certain products or services of the Company or of others. The Company may also contact users via surveys for examination of current or potential services and/or functionalities of the Website and/or the Service.
5. Company may, from time to time, contact you, whether for itself or on behalf of third parties about a particular offering that may be of interest to you. The Company may contact you by post, e-mail, telephone or fax for these purposes but your unique personally identifiable information (e-mail, name, address, telephone number) shall not be transferred to such third parties unless necessary in order to provide the Services. In addition, Company may share such unique personally identifiable information with third parties who are service providers for the Company bound by confidentiality undertaking, engaged by Company to help

Company perform statistical analysis, send users email or postal mail or provide customer support. All such third parties are prohibited from using your personal information except to provide these services to Company, and they are or shall be (as the case may be) required to maintain the confidentiality of your information.

6. Company may monitor and keep track of the Website and/or the Service in general and of users' visits on the Website in particular, in order to determine popularity of certain features and functionality of the Website and the Service and for other purposes, including commercial purposes. Company may use this data to improve, customize and personalize its services and deliver customized content and advertising within the Website and/or the Service to users whose behavior indicates that they are more interested in a particular subject area.
7. You are entitled to request in writing that your information be deleted from any and all of Company's data bases. You hereby acknowledge, however, that such removal of your Private Information may result in your inability to use all or some of the Website services and/or the Service and you shall not have any claim against Company with respect to your inability to use such services due to the foregoing.

Any such Private Information collected by Company shall not be disclosed to any third party without the prior written consent by you, subject to the exceptions specified herein. Company will disclose any of the Private Information, as provided via the Website and/or the Service, to third parties, only if: (a) Company is required to do so by law, or court order, injunction or decree; or (b) Company believes in good faith that such action is necessary to conform to or comply with the provisions of any law or with legal proceedings, to protect the rights or property of Company and/or to protect the personal safety of users of the Website and/or the Services, or the public; or (c) in case of dispute between Company and User; or (d) to verify your identity and prevent or detect fraud; or (5) upon User's consent.

#### **Other Web sites**

Company's Website and/or the Services may contain links to third party websites, which are specifically governed by their own terms of use and privacy policy, which are outside the Company's control and are not covered by this Privacy Policy. If you access other sites using the links provided on the Company's Website and/or the Services, the operators of these 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.

#### **Use of Cookies**

The Website uses "cookies" (whether of the Company or of third parties) to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a web page server.

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. For example, if you visit Company's Website, a cookie helps Company to recall your specific information on subsequent visits. This simplifies the process of recording your personal 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.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Company's Website and/or the Service.

#### **Security of your Personal Information**

Company reasonably secures the personally identifiable information you provide from unauthorized access, use or disclosure, on computer servers in a controlled and secured environment, protected from unauthorized access, use or disclosure. However, you acknowledge that the Website and/or the Service and its information protection systems are not immune from any breaches or sabotage, and third party may make unlawful and harmful use of the Website and/or the Service, including, but not limited to, uploading malicious files of any kind, viruses,

worms, Trojan horses and the such. 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.

### **Changes to this Policy**

Company may update this Privacy Policy from time to time, by placement of an updated policy in the Website, without giving any prior notice. The Privacy Policy published at any given time shall automatically replace the former Privacy policy and shall govern the relations between Company and users.

### **Contact Information**

Company welcomes your comments regarding this Privacy Policy. If you believe that Company has not adhered to this policy, please contact Company at 2 HaMenofim St., SeaViewe Building A, PO Box 12919, Herzliya 4672553, Israel **or by electronic mail at:** [info@cappitech.com](mailto:info@cappitech.com) and we will use commercially reasonable efforts to attend your comment.

### **Access rights**

To obtain a copy of the personal information the Company holds about you, please write with full details to us according to the contact details as set forth above.

### **Transfer of Data Abroad**

Company's servers are cloud based. If you are visiting the Website and/or the Service from a country other than the Private Information is stored, your communications with us may result in the transfer of information across international boundaries. By visiting the Website and/or using the Service and communicating electronically with us, you consent to such transfers.

### **Miscellaneous**

This Privacy Policy shall be governed exclusively by the internal substantive laws of the State of Israel, without respect to any conflict of laws principles. Any claim or dispute between User and Company that arises in whole or in part in connection with this Privacy Policy shall be decided exclusively by a court of competent jurisdiction located in Tel Aviv, Israel.

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**Cappitech – Privacy Policy**

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