

REFLECTIZ PRIVACY POLICY

Last Updated: August 27, 2020

In order to ensure transparency and give you more control over your personal information, this privacy policy (“**Privacy Policy**”) governs how we, Reflectiz Ltd. and its affiliates (together, “**Reflectiz**” “**we**”, “**our**” or “**us**”) use, collect and store Personal Data we collect or receive from or about you (“**you**”) such as in the following use cases:

- (i) When you browse or visit our website, www.reflectiz.com (“**Website**”)
- (ii) When you make use of, or interact with, our Website
 - a. When you request a free trial
 - b. When you contact us (e.g. customer support, partners inquiries, in order to establish business connection)
 - c. When you subscribe to marketing communications
 - d. When you book a meeting with one of our experts
- (iii) When you make use of our product and/or dashboard (“**Dashboard**”)
 - a. When you create an account and when you log in to the Dashboard
- (iv) When we use the Personal Data of service providers (e.g. contact details)
- (v) When we use the personal data of our customers (e.g. contact details)
- (vi) When we use the personal data of our resellers, distributors and/or agents (e.g. contact details)
- (vii) When you attend a marketing event and/or we exchange business cards and you provide us with your Personal Data
- (viii) When you interact with us on our social media profiles (e.g., Facebook, LinkedIn, Instagram, Twitter)

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. “**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.

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

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This Privacy Policy can be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy. If we implement significant changes to the use of your Personal Data in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

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 (GDPR only, if applicable)	Third parties with whom we share your personal data	Retention period	Consequences of not providing the Personal Data
When you browse or visit our Website					
Cookies, browsing fingerprinting, analytic and log files For more information, please read our cookies policy.	<ul style="list-style-type: none"> • To analyze, support and improve our Website • For marketing purposes 	Consent Legitimate interest (e.g. essential cookies)	3 rd party platforms such as for the following purposes: <ul style="list-style-type: none"> • LinkedIn • Google Tag Manager • HubSpot • Leadfeeder • Google Analytics – to maintain and improve the website and our Services 	For more information, please see our cookies policy.	Certain Website features may not be available.
When you make use of, or interact with, our Website					
When you request a free trial					
<ul style="list-style-type: none"> • Full name • Email address • Company name • Any other information that you decide to provide or supply us with 	<ul style="list-style-type: none"> • To provide you with a free trial • To communicate with you with respect to the trial (e.g., to coordinate the details of the trial) 	Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract Legitimate interest (e.g. to provide you with a free trial)	3 rd party platforms such as: <ul style="list-style-type: none"> • Hubspot – CRM 	Until we no longer need the Information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws	Cannot provide you with a free trial Cannot communicate with you with respect to the trial (e.g., to coordinate the details of the trial)
When you contact us (e.g. customer support, partners inquiries, in order to establish business connection)					
<ul style="list-style-type: none"> • Full name • Email address • Company name • Phone number 	<ul style="list-style-type: none"> • To offer our Service or enter a sales process • To process and answer questions 	Performance of a contract to which the data subject is party or in order to take steps at the request of the	3 rd party platforms such as: <ul style="list-style-type: none"> • Hubspot – CRM 	Until we no longer need the Information and proactively delete it or you send a valid deletion request. Please note that	Cannot enter a sales process or offer our Service Cannot answer your questions

<ul style="list-style-type: none"> Any other information you decide to provide us with 	<ul style="list-style-type: none"> To provide support (e.g., to solve problems, bugs or issues) and handle your complaints and/or feedback 	<p>data subject prior to entering into a contract</p> <p>Legitimate interest (e.g. provide support and answer your questions)</p>		<p>we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot provide support and handle your complaints</p>
<ul style="list-style-type: none"> Full name Email address Company name 	<ul style="list-style-type: none"> To establish a business connection 	<p>Consent</p>	<p>3rd party platforms such as:</p> <ul style="list-style-type: none"> Hubspot – CRM 	<p>Until we no longer need the Information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot establish a business connection</p>
When you subscribe to marketing communications					
<ul style="list-style-type: none"> Full name Email address 	<ul style="list-style-type: none"> To send you marketing communications 	<p>Consent</p>	<p>3rd party platforms such as:</p> <ul style="list-style-type: none"> Hubspot – CRM 	<p>Until we no longer need the Information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot send you marketing communications</p>
When you book a meeting with us					
<ul style="list-style-type: none"> Full name Email address Any other information you decide to provide us with 	<ul style="list-style-type: none"> To book a meeting To offer our Service or enter a sales process 	<p>Performance of a contract to which the data subject is party or 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 book and conduct a meeting with the data subject)</p>	<p>3rd party platforms such as:</p> <ul style="list-style-type: none"> Hubspot – CRM 	<p>Until we no longer need the Information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot book a meeting</p> <p>Cannot offer our Services or enter a sales process</p>
<ul style="list-style-type: none"> Full name Email address Company name 	<ul style="list-style-type: none"> To establish a business connection 	<p>Consent</p>	<p>3rd party platforms such as:</p> <ul style="list-style-type: none"> Hubspot – CRM 	<p>Until we no longer need the Information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot establish a business connection</p>
When you make use of our Dashboard					
<p>Cookies, analytic and log files.</p> <p>For more information, please read our cookies policy.</p>	<ul style="list-style-type: none"> To analyze, support and improve our Dashboard 	<p>Consent</p> <p>Legitimate interest (e.g. essential cookies)</p>	<p>3rd party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> Google Analytics 	<p>For more information, please see our cookies policy.</p>	<p>Certain Dashboard features may not be available.</p>
When you create an account and when you log in					
<ul style="list-style-type: none"> Full name Email address Password 	<ul style="list-style-type: none"> To grant you access to the Dashboard To allow you to make use of our Dashboard To develop and enhance the Dashboard To fulfill your requests for our services and for related activities (e.g., provide other services related to your relationship with Reflectiz) 	<p>Performance of a contract to which the data subject is party or 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 provide you with Reflectiz' services).</p>	<p>3rd party platforms such as:</p> <ul style="list-style-type: none"> Hubspot – CRM Google Analytics 	<p>Until we no longer need the Information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot grant you access to the Dashboard and you will not be able to use our services</p> <p>Cannot fulfill your requests for our services and for related activities (e.g., to provide other services related to your relationship with Reflectiz)</p>
When we use the Personal Data of service providers (e.g. contact details)					
<ul style="list-style-type: none"> Full name Email address Company name Title Phone numbers 	<ul style="list-style-type: none"> To contact our service providers and suppliers 	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data</p>	<p>3rd party platforms such as:</p> <ul style="list-style-type: none"> Hubspot – CRM 	<p>Until we no longer need the Information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a</p>	<p>Cannot contact our service providers and suppliers</p> <p>Cannot perform the applicable agreement</p>

<ul style="list-style-type: none"> Any other data you decide to provide/supply us with 	<ul style="list-style-type: none"> To perform the applicable agreement 	<p>subject prior to entering into a contract.</p> <p>Legitimate interest (e.g. perform the contract, send contract-related communications)</p>		<p>longer or shorter period in accordance with data retention laws</p>	
When we use the Personal Data of our customers (e.g. contact details)					
<ul style="list-style-type: none"> Full name Email address Company name Title Phone numbers Any other data you decide to provide/supply us with 	<ul style="list-style-type: none"> To provide our services To perform the applicable agreement To communicate with our customers (e.g., to inform you of updates) 	<p>Processing is necessary for the performance of a contract to which the data subject is party.</p> <p>Compliance with a legal obligation (e.g. tax laws, bookkeeping laws, etc.).</p> <p>Legitimate interest (e.g. send you contract-related communications)</p>	<p>3rd party platforms such as:</p> <ul style="list-style-type: none"> Hubspot – CRM 	<p>Until we no longer need the Information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot provide the services</p> <p>Cannot perform the agreement</p> <p>Cannot communicate with you</p>
When we use the Personal Data of our resellers, distributors and/or agents (e.g. contact details)					
<ul style="list-style-type: none"> Full name Email address Company name Title Phone numbers Payment information Any other data you decide to provide/supply us with 	<ul style="list-style-type: none"> To discuss business terms and to perform the applicable agreement To communicate with our resellers 	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Compliance with a legal obligation (e.g. tax laws, bookkeeping laws, etc.).</p> <p>Legitimate interest (e.g. send you contract-related communications).</p>	<p>3rd party platforms such as:</p> <ul style="list-style-type: none"> Hubspot – CRM 	<p>Until we no longer need the Information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot discuss business terms and to perform the applicable agreement</p> <p>Cannot communicate with our resellers</p>
When you attend a marketing event and/or we exchange business cards and you provide us with your Personal Data					
<ul style="list-style-type: none"> Full name Email address Company name Phone numbers Any other data you decide to provide/supply us with 	<ul style="list-style-type: none"> To establish a business connection To send you marketing communications 	<p>Depending on the context, legitimate interest (B2B marketing), pre-contractual discussions or consent</p>	<p>3rd party platforms such as:</p> <ul style="list-style-type: none"> Hubspot – CRM 	<p>Until we no longer need the Information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot establish a business connection</p> <p>Cannot send you marketing communications</p>
When you interact with us on our social media profiles (e.g., Facebook, LinkedIn, Instagram, Twitter) Personal Data					
<ul style="list-style-type: none"> Any data that you decide to supply/provide us 	<ul style="list-style-type: none"> To reply and/or respond to your request or question To establish a first business connection/discussion (in accordance with your request) 	<p>Depending on the context, legitimate interest (B2B marketing), pre-contractual discussions or consent</p>	<p>3rd party platforms such as:</p> <ul style="list-style-type: none"> Hubspot – CRM The social media platform 	<p>Until we no longer need the Information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot reply or respond to your request</p> <p>Cannot establish a business connection</p>

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 DATA

- **Security.** We have implemented appropriate technical, organizational and security measures designed to protect your Personal Data. However, please note that we cannot guarantee that the information will not be compromised as a result of unauthorized penetration to our servers. 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.
- **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.

3. HOW WE SHARE YOUR PERSONAL DATA

In addition to the recipients described above, we may share your Personal Data as follows:

- With our business partners with whom we jointly offer products or services. We may also share Personal Data with our affiliated companies.

- 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;
- 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;
- 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
- 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).

If you want to receive the list of the current recipients of your personal data, please make your request by contacting us to privacy@reflectiz.com.

4. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL DATA

- Storage: HubSpot and Google.
- 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.
- External transfers: Where we transfer your personal data outside of EU/EEA (for example to third parties who provide us with services), we will obtain contractual commitments from them to protect your personal data.

5. YOUR PRIVACY RIGHTS. HOW TO DELETE YOUR ACCOUNT

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.

5.2 You can exercise your rights by contacting us at privacy@reflectiz.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.

5.3 Deleting your account: Should you ever decide to delete your account, you may do so by emailing privacy@reflectiz.com. If you terminate your account, any association between your account and Personal Data we store will no longer be accessible through your account.

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. 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@reflectiz.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 may 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

- **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.

10. SPECIFIC PROVISIONS APPLICABLE UNDER CALIFORNIA PRIVACY LAW

- **California Privacy Rights:** California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of Personal Data to third parties for their direct marketing purposes. To make such a request, please send an email to privacy@reflectiz.com. Please note that we are only required to respond to one request per customer each year.
- **Our California Do Not Track Notice (Shine the Light):** Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- **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.

11. 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: privacy@reflectiz.com.