

**Poultrix Ltd.**  
**Privacy Policy**

Poultrix Ltd. and its subsidiaries (collectively “**Poultrix**”, “**Company**” “**we**” or “**us**”) respects the privacy of its users (“**User(s)**” or “**you**”) and is committed to protect the personal information that its Users share with it.

This Privacy Policy is to inform you what information we collect when you visit our website at <https://poultrix.com/> (the “**Site**”) and when you use our SAAS platform (the Platform, and collectively, the “**Services**”), the manners in which we may use such information and the choices and rights available to you.

Capitalized terms which are not defined herein, shall have the meaning ascribed to them in our Terms of Use available at <https://poultrix.com/Policies/terms-of-use.pdf> (which this Privacy Policy is incorporated thereto by reference (together, the “**Terms**”).

**1. Your Consent (PLEASE READ CAREFULLY!)**

By accessing the site and/or using the Service, you agree to the terms and conditions set forth in this privacy policy (the “**Privacy Policy**”), including to the collection and processing of your Personal Information (as defined below) in the event you decide to provide us with such in our site. If you disagree to any term provided herein, you may not use the site.

Please note: you are not obligated by law to provide us with any Personal Information.

**2. WHAT INFORMATION DO WE COLLECT?**

**a. First - What is personal information?**

Personal information is individually identifiable information, namely information that identifies an individual or may with reasonable efforts or together with additional information we have access to, enable the identification of an individual, or may be of private or sensitive nature information relating to an identified or identifiable natural person. Identification of an individual also includes association of such individual with a persistent identifier such as a name, an identification number, persistent cookie identifier etc.

Personal information does not include information that has been anonymized or aggregated so that it can no longer be used to identify a specific natural person.

**b. We collect personal information from you when you use or interact with our Services**

We collect personal information from you and any devices you use when you: use or access our Services, register for an account to use the Platform (whether by our representatives or online form), provide us information on a web form, update or add information to your account, or through correspondence you and we conduct with each other.

More specifically we collect and use the following categories and types of information:

**Personal information you give us when you use our Services**

Generally, this category refers to any information, data or content you actively and voluntarily create or provide through our Services.

- Information such as your name, email, physical address, telephone number when you register an account.
- Contact information such as your name, email, physical address and telephone number when you wish to contact us.
- Other content that you generate, or your actions in your use of your account.

- Information we are required or authorized by applicable national laws to require you to provide us in order to authenticate or identify you or to verify the information we have collected.

### **Personal information we collect automatically when you use our Services**

- We collect certain information based on your configuration of the Services, such as, activity on the cloud by a certain workstation, which may be connected to a certain you or to the Personnel. This is information we receive from devices and software you use when you access our Services. This information could include your IP address.

We perform such automatic collection through use of cookies, web beacons, unique identifiers, and similar technologies which allow us to collect information about the pages and screens you view, the links you click, and other actions you take when using our Services, as further detailed in section 7.

### **Personal information collected from other sources**

- We may also collect personal information concerning you, from third parties who have assured us that they have obtained your consent for such provision of information or that you have freely and publicly provided. For example, we may collect and use additional contact information, credit check information, and information from credit bureaus, as allowed by applicable national laws.
- In addition, we may publish open positions in the Company via its website, Facebook or LinkedIn page. In connection with this opportunity, we collect information that is provided to us by the job candidates (“Candidates”), when they apply to any of the open positions published by us, by e-mail, or otherwise.

For avoidance of doubt, any Non-Personal Information connected or linked to any Personal Information shall be deemed as Personal Information as long as such connection or linkage exists.

**We do not collect any Personal Information from you or related to you without your approval, which is obtained, inter alia, through your active acceptance of the Terms and the Privacy Policy.**

**TO THE EXTENT THAT YOU PROVIDE TO US ANY PERSONAL INFORMATION IN CONNECTION WITH ANY THIRD PARTY, INCLUDING ANY OF YOUR PERSONNEL YOU ARE SOLELY RESPONSIBLE TO RECEIVE AND HEREBY REPRESENT AND UNDERTAKE TO HAVE RECEIVED THE CONSENT, AUTHORITY, PERMISSION AND APPROVAL OF SUCH PERSON AND PROVIDED THEM WITH SUFFICIENT DISCLOSURES, TO ALLOW THE USE OF SUCH PERSONAL INFORMATION, AND TO ALLOW POUltrix TO ACCESS, STORE, COLLECT, ANALYZE AND PROCESS SUCH PERSONAL INFORMATION AS DETAILED HEREIN. YOU SHOULD INFORM SUCH THIRD PARTY HOW WE COLLECT, USE, DISCLOSE, AND RETAIN THEIR PERSONAL INFORMATION ACCORDING TO THIS PRIVACY POLICY.**

### **3. How Do we Use Your Personal Information?**

#### **Legal basis for use.**

We collect, process and use your information for the purposes described in this Privacy Policy, based at least on one of the following legal grounds:

- **When Performing this Agreement:** We collect and process your Personal Information in order to provide you with the Service, following your acceptance of this Terms; to maintain and improve our Services; to develop new Services and features for our Users; and to personalize the Services in order for you to get a better user experience.
- **Legitimate interests:** We process your information for our legitimate interests while applying appropriate safeguards that protect your privacy. This means that we process your information for things like detecting, preventing, or otherwise addressing fraud, abuse, security, usability, functionality or technical issues with our Services, protecting against harm to the rights, property or safety of our properties, or our users, or the public as required or permitted by law; Enforcing legal claims, including investigation of potential violations of this Privacy Policy; in order to comply and/or fulfil our obligation

under applicable laws, regulation, guidelines, industry standards and contractual requirements, legal process, subpoena or governmental request, as well as our Terms of Service.

- **With your consent:** We ask for your agreement to process your information for specific purposes and you have the right to withdraw your consent at any time.

#### Purpose of Use.

We may use information that we collect about you for the following purposes:

- To provide and improve our Services and manage our business;
- Track the usage of users in the system;
- To create cumulative statistical data and other cumulative information and/or other conclusive information that is non-personal, in which we and/or our business partners might make use of in order to operate and the Services;
- Provide our User with a better user experience.
- Be able to contact Users who requested such contact to be made, for the purpose of providing them with further information on Poultrix and its Services;
- Be able to provide the Users updates about the Company's developments.
- To prevent, detect, mitigate, and investigate fraud, security breaches or other potentially prohibited or illegal activities;
- To comply with any applicable rule or regulation and/or response or defend against legal proceedings versus us or our affiliates.

#### **4. Job Candidates**

The Company welcomes all qualified Candidates to apply to any of the open positions posted on our website, Facebook, LinkedIn, by sending us their contact details and CV ("Candidates Information"). We are committed to keep Candidates' Information private and use it solely for our internal recruitment purposes (including for identifying Candidates, evaluating their applications, making hiring and employment decisions, and contacting Candidates by phone or in writing).

Please note that the Company may retain Candidates Information submitted to it even after the applied position has been filled or closed. This is done so we could re-consider Candidates for other positions and opportunities at the Company; so we could use their Candidates Information as reference for future applications submitted by them; and in case the Candidate is hired, for additional employment and business purposes related to their work.

If you previously submitted your Candidates Information to the Company, and now wish to access it, update it or have it deleted from our systems, please contact us at: [info@poultrix.com](mailto:info@poultrix.com).

#### **5. Sharing Information with Third Parties**

Poultrix may share your Personal Information with third parties (or otherwise allow them access to it) only in the following manners and instances:

- a. **Third Party Services:** Poultrix has partnered with a number of selected service providers, whose services and solutions complement, facilitate and enhance our own. These include hosting, database and server co-location services, data analytics services, customer relationship management platforms, data and cyber security services, fraud detection and prevention services, e-mail and text message distribution and monitoring services, payment processors, dispute resolution providers, customer support and call center services, session replay records for app analytic purposes such as crashes, functionality and usability, remote access services and our business, legal and financial advisors (collectively, "**Third Party Service Providers**").

Such Third Party Service Providers may receive or otherwise have access to your Personal Information, depending on each of their particular roles and purposes in facilitating and enhancing the Services, and may only use your Personal Information for such purposes. Such disclosure or access is strictly subject to the recipient's or user's undertaking of confidentiality obligations, and the prevention of any independent right to use this data except as required to help us provide the Services. We are remained

responsible and liable for any Personal Information processing done by Third Party Service Provider on its behalf, except for events outside of its reasonable control.

**Google Analytics.** Google's ability to use and share information collected by Google Analytics about your visits and use the Services is restricted by the Google Analytics Terms of Service, available at <http://www.google.com/analytics/terms/us.html>, 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/>.

- b. **Law enforcement, legal proceedings, and as authorized by law:** We may disclose or otherwise allow access to your Personal Information pursuant to a legal request, such as a subpoena, search warrant or court order, or in compliance with applicable laws, with or without notice to you, if we have a good faith belief that we are legally required to do so, or that disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, counter terrorist financing verification requirements, fraud, or other wrongdoing.
- c. **Protecting Rights and Safety:** We may share your Personal Information with others, with or without notice to you, if we believe in good faith that this will help protect the rights, property or personal safety of Poultrix, any of our Users, or any member of the general public.
- d. **Poultrix Subsidiaries and Affiliated Companies:** We may share Personal Information internally within our family of companies, for the purposes described in this Privacy Policy and in accordance with Section 3 above. In addition, should Poultrix or any of its affiliates undergo any change in control, including by means of merger, acquisition or purchase of substantially all of its assets, your Personal Information may be shared with the parties involved in such event. If we believe that such change in control might materially affect your Personal Information then stored with us, we will notify you of this event and the choices you may have you via e-mail and/or prominent notice on our Website or services.

**For the avoidance of doubt, Poultrix may share your Personal Information in additional manners, pursuant to your explicit approval, or if we are legally obligated to do so. Additionally, we may transfer, share or otherwise use Non-personal Information in our sole discretion and without the need for further approval.**

## 6. Where do We Store User's Personal Information?

Information regarding the Users will be maintained, processed and stored by us and our authorized affiliates and service providers in the Israel, and as necessary, in secured cloud storage, provided by our third-party service provider.

While the data protection laws in the above jurisdictions may be different than the laws of your residence or location, please know that we, our affiliates and our service providers that store or process your Personal Information on our behalf are each committed to keep it protected and secured, pursuant to this Privacy Policy and industry standards, regardless of any lesser legal requirements that may apply in their jurisdiction.

You hereby accept the place of storage and the transfer of information as described above.

## 7. Direct Marketing

You hereby agree that we may use your contact details for the purpose of informing you regarding our products and Services which may interest you and commercial updates about Poultrix's events and news appearances, and to send to you other marketing material, transmitted to the e-mail address you have provided. You may withdraw your consent via sending a written notice to Poultrix by email to the following address: [info@poultrix.com](mailto:info@poultrix.com).

Please note that the Company may also contact you with important information regarding our Website. For example, we may notify you (through any of the means available to us) of changes or updates to our Website, payment issues, service maintenance, etc. You will not be able to opt-out of receive such service messages.

## **8. Minors**

To use the Site, you must be over the age of sixteen (16). Poultrix does not knowingly collect Personal Information from children under the age of sixteen (16) and does not wish to do so. We reserve the right to request proof of age at any stage so that we can verify that minors under the age of sixteen (16) are not using the Site.

## **9. Information Security**

We take a great care in implementing and maintaining the security of our Services and its User's Personal Information. Poultrix employs industry standard procedures and policies to ensure the safety of its Users' Personal Information and prevent unauthorized use of any such information. The Personal Information may be hosted at Poultrix premises or at its third-party services providers, under advanced security features and protection. However, no measure can provide absolute information security.

## **10. Data Retention**

We retain the Personal Information we collect only for as long as needed in order to provide you with our Services and to comply with applicable laws and regulations. We then either delete from our systems or anonymize it without further notice to you.

If you withdraw your consent to us processing your Personal Information, we will delete your Personal Information from our systems (except to the extent such data in whole or in part to comply with any applicable rule or regulation and/or response or defend against legal proceedings versus us or our affiliates).

## **11. Updating, Obtaining A Copy Of, Or Deleting Your Personal Information**

If the law applicable to you grants you such rights, you may ask to access, correct, or delete your Personal Information that is stored in our systems. You may also ask for our confirmation as to whether or not we process your Personal Information.

Subject to the limitations in law, you may request that we update, correct, or delete inaccurate or outdated information. You may also request that we suspend the use of any Personal Information whose accuracy you contest while we verify the status of that data.

Subject the limitations in law, you may also be entitled to obtain the Personal Information you directly provided us (excluding data we obtained from other sources) in a structured, commonly used, and machine-readable format and may have the right to transmit such data to another party.

If you wish to exercise any of these rights, contact us at: [info@poultrix.com](mailto:info@poultrix.com). When handling these requests, we may ask for additional information to confirm your identity and your request. Please note, upon request to delete your Personal Information, we may retain such data in whole or in part to comply with any applicable rule or regulation and/or response or defend against legal proceedings versus us or our affiliates

To find out whether these rights apply to you and on any other privacy related matter, you can contact your local data protection authority if you have concerns regarding your rights under local law.

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

The terms of this Privacy Policy will govern the use of the Service and any information collected therein. Poultrix reserves the right to change this policy at any time, so please re-visit this page frequently. We will provide notice of substantial changes of this policy on the homepage of the Site and/or we will send you an e-mail regarding such changes to the e-mail address that you may have provided us with. Such substantial changes will take effect seven (7) days after such notice was provided on our Site or sent by email. Otherwise, all other changes to this Privacy Policy are effective as of the stated "Last Revised" date and your continued use of the Site after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes.

## **13. General Information**

This Privacy Policy, its interpretation, and any claims and disputes related hereto, shall be governed by the laws of the State of Israel, without respect to its criminal law principles. Any and all such claims and disputes shall be brought in, and you hereby consent to them being litigated in and decided exclusively by a court of competent jurisdiction located in Tel Aviv, Israel.

This Privacy Policy was written in English and may be translated into other languages for your convenience. If a translated (non-English) version of this Privacy Policy conflicts in any way with the English version, the provisions of the English version shall prevail.

#### **14. Have any Questions?**

If you have any questions (or comments) concerning this Privacy Policy, you are welcome to send us an email at: [info@poultrix.com](mailto:info@poultrix.com) and we will make an effort to reply within a reasonable timeframe.