



GINZIO PRIVACY POLICY

EFFECTIVE DATE: 16.7.2023

Ginzi.io Ltd. (hereafter - “**the Company**”) consider the protection of privacy to be paramount. The Company dedicates significant efforts to the adequate protection of the information that you provide and employs the means that are necessary for maintaining information security and your privacy.

Company operates websites on the ginzi.io domain (hereafter - “**the Website**”). This privacy statement specifies the information that the Company collects in your regard and the use of such information as part of your use of its digital services, including the Website, cellular applications and other on-line services (hereafter - “**the Services**”).

Where necessary, additional information in relation to specific products and services is presented alongside such products and/or services regarding the processing of your personal information.

Any information that is provided by you and/or that is received as part of the provision of the Services and/or as a result of your use of the Services, including on the Website and/or the applications, will be protected in accordance with the Protection of the Israeli Privacy Law 1981 and subject to the legal or regulatory obligations and/or requirements that apply to Company.

This Privacy Policy applies to information that is identified or reasonably identifiable. As a rule, you are not legally obligated to provide the information that is specified below, however failure to provide it may impede our provision of certain Services to you.

The information will be maintained in the Company’s databases for the duration that is required for the Company to carry out the objectives that have been authorized for it by law and pursuant to this Privacy Policy.

WHAT INFORMATION DO WE COLLECT AND HOW DO WE COLLECT IT?

Contact information – The Company collects information relating to the provision of the Services, including first and last name, address, e-mail address, payment information, workplace, occupation and position, mobile or landline number. Such information will be collected from the information that is directly provided by you in the “personal information” field or as part of registration for and/or use of the Services or as a result of your application to the Company, or out of information that the Company will receive from third parties.

Information relating to use of technologies – The Company employs various technologies that allow us to monitor the activity on the Website and the cellular applications for the purpose of maintaining information security, improving the efficiency of the Services, customizing the Services to your personal preferences as well as for statistics and the advertising and marketing of the Services. Some of these technologies are provided by third parties. Those third parties, such as Facebook and Google, may use cookies, web beacons, and other storage technologies to collect or receive information from your websites and elsewhere on the internet and use that information to provide measurement services and target ads. This usage is also subject to those third parties’ terms of use and privacy policies.

In particular, the Company uses technologies of Google (Google Analytics and Google Tag Manager, Firebase). For further details on the way Google uses personal information see the link “[How Google uses data when you use our partners' sites or apps](#)”. The Company also uses technologies of Lucky Orange and GlassBox. You can manage and cease collection and use of your information by Lucky Orange by pressing on the following link: <https://privacy.luckyorange.com/> and by Facebook in the privacy settings in your personal Facebook account.

Among others, the Company will use cookies. Cookies are essentially text files (or code lines) that are created on the browser and/or on your mobile device, to the extent that you have allowed this in the settings of the device/computer, and collect relevant information, such as the duration of your visit on the site/page/screen, your browsing method and the actions performed therein. The use of cookies facilitates your identification when you revisit our websites. Additionally, the cookies will monitor your activities and automatically collect information such as: IP address, connection dates, duration of your visit, version of the operating system, type of browser, IOP-based location, domain name and point of access to the Service, other digital identification codes and more.

The settings of your device/computer may be updated or modified to completely or partially block the use of cookie files. However, if you choose to block cookies, some of the Services may not be available to you or you may be required to reenter your personal information. Such modification of settings is your responsibility.

Additional information on the use of cookies by third parties is available at:

<https://policies.google.com/technologies?hl=en>
<https://www.facebook.com/policies/cookies>
<https://www.luckyorange.com/privacy.php>
<https://www.glassbox.com/cookie-policy/>

You can also opt out from these tools during your browsing, for example by using the following websites:

<http://www.aboutads.info/choices/>
<http://www.youronlinechoices.eu/>

Google also offers an add-on for browsers that prevents it from collecting information.

Information provided as part of participation in surveys – The Company may occasionally ask you to provide information by participating in surveys. Participation in such surveys is voluntary and you can choose not to provide the information.

Information on others - When you provide us information on others, it is your responsibility to verify that this is done in accordance with the provisions of the law, including the Israeli Protection of Privacy Law, 1981 and the Israeli Communication Law (Bezeq and Broadcasting), 1982. The provision of information about others is subject to their consent and this policy.

HOW DO WE USE YOUR INFORMATION?

The Company will use the information in your regard for the purpose of providing the Services, including through third parties, for operational purposes, for contacting you, responding to public inquiries, customer services, direct or automated marketing including targeted advertising (further details in the chapter of “Advertisements and direct mail” below), management, streamlining and monitoring of our Services, compliance with procedures and policies, information security, handling applications for viewing and amendment of information, statistics and research (including the use of means such as anonymization and pseudonymization, for making personal information unidentifiable or not directly identifiable), prevention of fraud and/or illegal activities, and protection of legal rights and legitimate interests of ours and of others, all subject to the provisions of any law.

The Company may process and tag the information that is provided by you and/or information concerning your activities, including through anyone on its behalf. The products of the information processing may be used to offer you, from time to time, various products or services that may be of interest or assistance to you, all subject to your rights under any law.

TRANSFER OF INFORMATION TO A THIRD PARTY

The Company may transfer the information to third parties, whether in Israel or overseas, in the following cases:

- For the purposes of the objectives set out in this Privacy Policy, for the purpose of realizing the objectives that we have been authorized to perform by law, and for the realization of legitimate interests that we have, such as the prevention of fraud. Such transfer of information will be subject to the third party's undertaking to maintain privacy and information security at a level that is appropriate for the type of information being transferred.
- As part of our engagement with subcontractors and suppliers that provide us with auxiliary services (such as companies processing credit card payments, cloud service providers, companies that provide support and maintenance for equipment, software providers, accountants, lawyers, banks, customer service centers and telecommunications companies).
- As part of the sale of the Company's business (in part or in whole) or during negotiation of such sale, provided that such third party meets the provisions of the law concerning protection of privacy and information security.
- Under a court order instructing the Company to do so or as required by law.
- For the purpose of defense in legal claims.
- The Company may transfer personal information to third parties for research and statistical purposes. In such case, personal information will be transferred in aggregate form, using measures to impede your identification with reasonable effort.
- Subject to your express consent and to the law, we may transfer your personal information to third parties for the marketing and advertising of their products and services.

USE OF APPLICATIONS

This Privacy Policy also applies to your use of the Company's applications, for which we wish to stress the following additional points:

- If notifications have been activated in your device, we will be able to send you various notifications relating to the application on your device, actions performed in the application, important updates and occasional offers of various products or services that may be of interest to you, based on your preferences and/or your use of the application, all subject to your rights under any law. You may remove or block notifications by changing the settings in the operating system of your device.
- Access and authorizations:
 - Authorization of receipt of push notifications from the application - This authorization will allow you to receive push notifications of important updates as well as occasional offers of various products or services that may be of interest to you, based on your preferences and/or your use of the application, all subject to your rights under any law.
 - Access to the photo gallery and to storage and memory on your device - This authorization will allow you to save screenshots of actions in the application or screens of the application and/or to select photographs from your photo gallery as a profile/background photograph and/or to upload files from the device's memory at your request.
 - Access to viewing content of SMS messages - This access is necessary for data optimization and information security, identification and verification of information and for the viewing of a code that is automatically delivered to your device by SMS.
 - Access to identity data/phone/device ID - Required for creating a unique identifier when registering for various services, identification, verification and security tests.

At any time, you may change the access settings of the applications in the settings menu on your device.

LINKS TO THIRD PARTIES

When using the Website, links to outside pages may appear, such as advertisements, banners, links etc. Should you choose to use such links, once you click on them you will be subject to the terms of the privacy protection policy of such websites/pages/applications. It is hereby clarified that you are fully responsible for the use of such outside websites/pages/applications.

ADVERTISEMENTS AND DIRECT MAIL

As mentioned above, the information may also be used for the marketing, advertising and direct mail purposes of the Company or anyone on its behalf, as well as for delivery of information on products and services of third parties that are provided in cooperation with us, including personalized advertising.

We may send you direct mail and advertisements in relation to our Services (and subject to your consent, also in connection with other services or products) through any means of communication, including via e-mail, SMS messages, automated dialing systems and social media.

You can request to be removed from the mailing list of advertisements with certain means and from the mailing list of direct mail, by written application to the Company at the e-mail address that is specified in the mailing or through the “contact” page of the Website.

Please be advised that even after you apply for removal from the mailing list you will continue to receive mailing that the Company is required and/or permitted by law to deliver to you without requiring your consent.

RIGHT TO ACCESS, CORRECT AND DELETE INFORMATION

Subject to the law, you may apply to the Company in writing, as described below, to view the information (as defined in the protection of privacy law) that is kept by the Company in your regard. If you find that the information that we have of you is incorrect, you are entitled to request its amendment, or deletion if law gives you that right. Refer to the “contact” page of the website to request for the removal of other information. Your request to the Company should specify the identifiers that are requested of you, so that we may properly identify you and review your request in accordance with law. We will let you know our conclusions and delete your information if the law gives you that right.

INFORMATION SECURITY

The Company employs information security means that are appropriate for the type of information that it holds and in conformity with the provisions of the law. For this purpose, the Company employs reasonable and customary security means that are in line with the standards practiced in this field. Notwithstanding the aforesaid, there is a risk of penetration of the Company’s data and information bases. As long as the Company employs reasonable means of security, it will not be responsible for any damage caused as a result of such unauthorized penetration and the consequent transfer of information to a third party. It is hereby clarified that you are also responsible for maintaining appropriate means of information security, such as use of a strong password, anti-virus software, software updates etc.

NOTICES OF CHANGES AND UPDATES

The Company may amend this Privacy Policy from time to time, as necessary and at its sole discretion. If we make material updates to this Privacy Policy we will update the EFFECTIVE DATE at the top of the Privacy Policy.

CONTACT US

If you have any questions, comments or concerns about this Privacy Policy or the way your personal data is being used or processed by the Company, please submit any questions, comments or concerns to sales@ginzi-ai.com.