

BAZAN GROUP – BLAKE

PRIVACY POLICY

[Last Amended: May16, 2021]

Bazan Group, and its related companies, including subsidiaries (“**Bazan Group**,” “**we**,” “**our**,” or “**Company**”) respects the privacy of its Visitors and Platform's Users (as such terms shall be defined below).

This privacy policy (“**Privacy Policy**”) governs our privacy practices with respect to the Personal Data (as such term is defined below) we process from individuals who access and use our website available at: <https://bazanapps.bazan.co.il/blake/> (“**Website**”) and users of our Blake Platform, as such term is defined in the Terms of Use , and shall be collectively referred to herein as “**you**” or “**user**”.

If you have any questions or requests regarding the processing of your Personal Data, or would otherwise like to contact us in connection with this Privacy Policy, please send us an email to: bnnovation@bazan.co.il.

Please note that – this Privacy Policy apply solely to Personal Data collected and processed by Bazan Group and shall not apply to any data collected through the Third-Party Platform you access or otherwise create an account with in order to access the Blake Platform. The Third-Party Platform's polices shall govern the privacy practice of such Third-Party Platform's operator, and Bazan shall have no responsibility or liability in this regard.

INFORMATION WE COLLECT

We may collect two types of data and information from you, depending on your interaction with us.

- “**Personal Data**” is any information which identifies or can be reasonably used to identify a natural person. Such data includes for example: first and last name, phone number, email address, unique online identifiers, billing information, credit card details, etc.
- “**Non-Personal Data**”, or anonymized data, is information which does not identify a specific natural person and cannot reasonably be used for such identification. This type of information includes for example aggregate or statistical data or otherwise, technical information transmitted from your device such as type of browser and operating system, etc.

For the avoidance of doubt, any Non-Personal Data connected or linked to any Personal Data shall be considered Personal Data for as long as such connection or linkage exists.

You are not required by law to provide us with any information. You are always able to avoid providing us with certain Personal Data; however, you acknowledge, that this may prevent you from using certain features of the Website or using our Platform.

The table below details the types of Personal Data we collect when you access the Website or use the Blake Platform:

Type of Personal Data	Purpose of Processing
Contact Details	We will use this information solely for the purpose of contacting you, responding to your

<p>In the event you contact us for support or other inquiries, including when you apply a request to sign up or otherwise receive access to our Blake Platform, either through the online form available on the Website, by sending us an email or by any other means of communications that we make available to you, you will be requested to provide us with your email address your full name, phone number, company name and position.</p>	<p>inquiries and providing you with the support or information that you requested.</p> <p>We may process the contents of our correspondence with you in order to improve our customer services, as well in order to resolve any disputes with you (if applicable).</p>
<p>Online Identifiers</p> <p>When you access our Website or interact with our Platform, we may collect certain online identifiers (e.g. your IP address).</p> <p>Please note that, we do not attempt to analyze or determine your identity based on such information or otherwise combine it with any information such as your name or email address.</p>	<p>We process this data under our legitimate interests of operating, providing, maintaining, protecting, managing, customizing and improving our Website, and the way in which we offer it; (ii) enhancing your experience with the Website; (iii) our legitimate interests of auditing and tracking usage statistics and traffic flow.</p>
<p>Registration</p> <p>If you subscribe to use the Platform, we will collect Personal Data that you are required to provide us during the process of setting up your account, such as your or your employer's name (in the event applicable), email address, phone number, company name and, where applicable, payment details (that will be collected and processed by our third-party service providers and which we will not store or process).</p>	<p>This information will be processed for the purpose of verification, setting up your account and enable you to use the Platform, to send you needed information (by email or text message) related to the Platform, your account and our business engagement, for example, "Welcome" emails, invoices, reminders regarding the renewal of your subscription, etc.</p> <p>In addition, we may process your Personal Data to send you marketing and promotional messages and offers related to our Platform. You are able to unsubscribe from receiving such correspondence from us by clicking on the designated link in the applicable message.</p>

HOW WE COLLECT INFORMATION

Depending on the nature of your interaction with, we may collect information as follows:

- (i) **Automatically** – we may use cookies (as elaborated in the section below) or similar tracking technologies to gather some information automatically when you interact with the Website.
- (ii) **Provided by you voluntarily** – we will collect information if and when you choose to provide us with the information, such as communications with us, as part of the registration process etc., all as explained in this Privacy Policy.

SHARING INFORMATION WITH THIRD PARTIES

We **do not share any Personal Data** collected from you with third parties except in the following events:

- (i) **Affiliated Companies** - With our subsidiaries, joint ventures, or other companies under common control with the Company solely if and when applicable or necessary for the purposes described in this Privacy Policy, or in the event of any of the corporate transactions listed herein.
- (ii) **Service Providers & Third-Party Platform** - To collect, hold or manage your Personal Data through our authorized third-party service providers and to perform certain requested services on our behalf, as reasonable for our business purposes, all of whom we contractually ensure comply with applicable data protection laws. Some examples of service providers that we may use include (without limitation): payment processors, server and storage providers and marketing partners. In addition, we may provide the Blake Platform through a Third-Party Platform, and thus, in order to provide you with access, we may share your email address with such Third-Party Platform.
- (iii) **Enforcement of our Rights & Compelled Disclosures** - To enforce this Privacy Policy and the terms of our agreements, including the investigation of potential violations thereof, as well as where required to comply with a legal requirement, for the administration of justice, to protect the vital interests of data subject or the vital interests of others, and to take precautions against legal liability.
- (iv) **Security Detections** - To detect, prevent, or otherwise address fraud, security or technical issues.
- (v) **Change of Control** - In the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation or asset sale, etc.), we may share Personal Data with our affiliated companies or acquiring company, which will assume the rights and obligations as described in this Privacy Policy.
- (vi) **Explicit Consent** - If you provide us with your explicit approval to share your information prior to the disclosure.

DATA RETENTION

Unless you instruct us otherwise, and subject to applicable laws, we retain the Personal Data we collect for as long as needed to provide our Platform and the associated services and to comply with our legal obligations, resolve disputes and enforce our agreements, if applicable.

YOUR RIGHTS RELATED TO YOUR PERSONAL DATA

Depending on your jurisdiction, data protection and privacy laws provide you with the ability to exercise certain rights regarding your Personal Data that we process. The principal rights includes the right to access your Personal Data; the right to ensure your Personal Data is accurate, complete and up to date; the right to have your Personal Data amended or otherwise deleted; the right to object to the processing of your Personal Data; the right to send or “port” your

Personal Data; the right to file a complaint with a supervisory authority in your jurisdiction; and the right to withdraw consent, subject to legal or contractual restrictions and reasonable notice;

If you wish to exercise any or all of the above rights, please send us email at: bnnovation@bazan.co.il

If we are unable to provide you with the information that you asked for, we will endeavor to explain the reasoning for this and inform you of your rights. We reserve the right to ask for reasonable evidence to verify your identity before we provide you with any such information in accordance with applicable law.

DATA TRANSFER

Your Personal Data might be stored outside your jurisdiction, including within cloud services in the US or EU. We take appropriate measures to ensure that Personal Data receives an adequate level of protection in transfer, as required under applicable law.

HOW DO WE PROTECT PERSONAL DATA?

We implement extensive security measures to reduce the risks of damage, loss of information and unauthorized access or misuse of personal data. We implement appropriate data collection, storage and processing practices and security tools to protect personal data against unauthorized access, alteration, disclosure or destruction.

Please contact us at: bnnovation@bazan.co.il if you believe that your privacy was treated in a way that was not in accordance with this Privacy Policy. In the event of a security incident in which we discover that your Personal Data may be at risk, we will take reasonable efforts to notify you and the applicable authority (if we are required to do so, subject to applicable laws).

PROTECTING CHILDREN

The Website and our Platform are not intended for use by individuals who are under the age of 18. Therefore, Bazan Group does not intend and does not knowingly collect any Personal Data directly from children under the age of 18, and does not wish to do so. If we become aware that an individual under the age of 18 has provided us with Personal Data, we will delete such data from our databases.

CHANGES TO THE PRIVACY POLICY

Bazan Group may, at any time and from time to time, modify this Privacy Policy. Modifications to this Privacy Policy will be posted on the Website, and shall be effective as of the date in which they are posted on the Website. The last revision date will be reflected in the “*Last Amended*” heading located at the top of the Privacy Policy. We will make a reasonable effort to notify you in the event that we implement any changes that substantially changes our privacy practices. We recommend that you review this Privacy Policy periodically to ensure that you understand our privacy practices and to check for any amendments.

CONTACT US

If you have any questions (or comments) concerning this Privacy Policy, you are welcome to contact us at: bnnovation@bazan.co.il. We will make an effort to reply within a reasonable timeframe.