

## **ATIDOT SOFTWARE LTD.**

### **PRIVACY AND COOKIE POLICY**

*Last Updated: February, 2021*

(\*All capitalized terms shall have the meaning as defined below in the Full Privacy Policy)

Atidot Software Ltd.'s Privacy and Cookie Policy (the "**Privacy Policy**" or "**Policy**") explains our practices for processing Personal Data on our Website, in the operation of our Website, and in the provision of our Services. We process Personal Data as described in this Policy.

Atidot Software Inc. provides specialized business services to the Insurance industry. We are committed to protecting the privacy of Data Subjects whose Personal Data we hold and to processing their Personal Data fairly and lawfully in compliance with applicable data protections laws. You can access our full Privacy Policy below to help you understand better how we collect and use Personal Data. In it, we explain in more detail the types of Personal Data we collect, how we collect it, what is the legal basis of collection, what we may use it for, who we may share it with, what our retention periods are and what are your rights in relation to the Personal Data we collect.

Within the Privacy Policy you will find some specific examples of why and how we use Personal Data.

Read this policy and make sure you fully understand our practices in relation to privacy and protection of Personal Data, before you access or use the Website; and before you commission our Services. If you have further questions or concerns regarding this policy please contact us at: [info@atidot.com](mailto:info@atidot.com).

### **FULL PRIVACY AND COOKIE POLICY**

Atidot Software Inc. ("**Atidot**", "**we**", "**our**" or "**us**") provides this Privacy and Cookie Policy, as will be updated from time to time (our "**Policy**" or "**Privacy Policy**") to inform the Visitors of our Website, our Client's Representatives of our policies and procedures regarding the collection, use and disclosure of Personal Data in accordance with Applicable Laws that we are subject to.

#### **1. Definitions:**

"**Applicable Laws**" shall mean EU Privacy Laws, to the extent applicable to Atidot, and any other applicable privacy or other law to which Atidot is subject.

"**EEA**" shall mean the European Economic Area.

"**EU Privacy Laws**" shall mean the GDPR and or European Union Member State laws, rules and guidelines implementing or supplementing the GDPR.

"**GDPR**" shall mean Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation), and as amended, replaced or superseded from time to time.

"**Personal Data**" shall have the meaning ascribed to it in the GDPR. To put it simply, this information may identify an individual or is of a private and/or sensitive nature, such as an individual's name, address or insurance coverage.

"**Non Personal Data**" shall mean information that does not personally identify a natural person and does not reveal a natural person's specific identity, such as anonymized information.

"**Data Subject**" shall have the meaning ascribed to it in the GDPR and shall include all types of individuals defined herein, including Visitors, Client's Representatives, Client's Customers and Clients' Insurance Agents.

The terms "**Controller**" "**Processor**" "**Processing**", "**Supervisory Authority**", "**European Commission**" shall have the meaning ascribed to them in the GDPR.

"**Visitor**" shall mean a Data Subject that is visiting our Website (as defined below).

"**Client**" means a legal entity which has a signed agreement with Atidot for the provision of Services (as defined below) to that entity.

"**Client's Data Set**" is a compilation of information about the Client's Customers or about the Client's Insurance Agents which are provided by the Client to Atidot for performance of the Services.

"**Client's Representative**" shall mean a Data Subject who is a Client's employee, contractor or any other individual affiliated with and authorized by a potential Client or a Client to communicate with Atidot in relation to the Services.

"**Client's Customer**" shall mean a Data Subject who holds an insurance policy issued by a Client, also referred to as a policyholder, or for whose insurance policy the Client provides facultative insurance or reinsurance or who is otherwise insured by the Client and whose Personal Data is included in a Client's Data Set.

**“Client’s Insurance Agents”** shall mean Data Subjects which are professional licensed insurance agents who provide insurance agency services to the Client and whose Personal Data is included in a Client’s Data Set.

**“Services”** shall mean analysis of Client’s Data Sets in order to provide business insights to the Client; including consultation, support, reporting, and any other professional assistance we provide under an agreement with the Client.

**“Website”** shall mean our public website available at <https://www.Atidot.com/> providing professional and promotional information regarding our Services for Clients as well as our contact information.

This Policy was originally written in English. If you are reading a translation and it conflicts with the English version, please note that the English version prevails.

## **2. WHEN DOES THIS PRIVACY POLICY APPLY**

2.1. This Privacy Policy applies to Personal Data of Data Subjects that we receive, collect, use or otherwise Process in the operation of our Website while marketing and providing our Services.

2.2. This Privacy Policy does not apply to services that may have separate privacy policies that do not incorporate this Policy.

## **3. THE TYPES OF PERSONAL DATA THAT WE COLLECT**

### **3.1. PERSONAL DATA THAT DATA SUBJECTS PROVIDE TO US**

- a) If you are a Visitor to our Website and/or a Client’s Representative contacting us in relation to the Services, you may provide us with Personal Data through our contact form or our company email address in order for us to contact you. This Personal Data may include: your contact details such as: full name, email, company phone number and/or personal phone number, position in workplace and name of workplace, company and/or personal address including city, state/region, postal code (**“Contact Information”**). Please do not provide further Personal Data than is required for us to contact you.
- b) Visitors or Client’s Representatives may also provide us Contact Information of other individuals who will be the signatory/ies to an agreement between us and the Client and/or who will manage the relationship with us on behalf of the Client. Please do not provide us Personal Data of another individual unless you are authorized to do so by a Client.

### 3.2. THE PERSONAL DATA THAT WE COLLECT OR GENERATE

- If you are a Visitor browsing our Website, we may collect your Personal Data. This includes (by way of a non-exhaustive list): your computer's Internet Protocol address or device ID and your Geo location through the use of "cookies" (For more information on our cookies and other means of tracking, and the purposes we use them for please see Section " 12 **COOKIES**" below).
- If you apply for employment with us, we will collect your personal identifiers (name, email address, telephone number, and social media handle) and your professional or employment-related information (resume, cover letter, employment history, and educational history).

Where we Process Personal Data of Visitors and Client's Representatives, we do so as Controllers. Where we process Personal Data of Client's Customers and Client's Insurance Agents, we do so as Processors.

## 4. NON PERSONAL DATA

4.1. In addition to the categories of Personal Data described above, we will also Process further anonymized information and data that is not Processed by reference to a specific individual. We may collect this Non-Personal Data about Data Subjects through the Website in the following ways:

- a) Information that a Visitor or Client Representative's browser sends ("**Log Data**"). This Log Data may include, but is not limited to, non-identifying information regarding the Representative's device, operating system, internet browser type, screen resolution, language and keyboard settings, internet service provider, referring/exit pages, date/time stamps, the web page you were visiting and information you search, etc.
- b) We may use automated devices and applications to evaluate usage of our Service. We use these tools to help us improve our Website, performance and user experience. We may also engage third parties to track and analyze Non Personal Data or provide other services on our behalf. Such third parties may combine the information that we provide about you with other information that they have collected from other sources. This Policy does not cover such third parties' use of the data and such use is governed by such third parties' privacy policies.
- c) We use Wix's analytics tools to help us understand Visitors' behaviour on our Website, subject to this policy:

<https://support.wix.com/en/article/cookies-and-your-wix-site>. Further information about your option to opt-out of these analytics tools is available at: [REDACTED]@ [REDACTED].

- d) Other websites and applications may also place or read cookies on a Visitor or Client Representative's computer's browser. Please see below the Section "**8SHARING INFORMATION WITH OTHERS**" below.

## 5. HOW WE USE PERSONAL DATA

5.1. Personal Data is used for the following primary purposes (as may be updated from time to time):

- a) To provide and operate the Website;
- b) to monitor and analyze use of the and to study the functionality of the Website;
- c) to provide on-going assistance and technical support to Clients and to maintain the Website;
- d) to provide service announcements and notices, promotional messages and market our Services;
- e) to enforce our Terms of Use, policies and other contractual arrangements;
- f) to comply with court orders and warrants, and prevent misuse of the Website, and to take any action in any legal dispute and proceeding;
- g) to better understand Visitors' and Client Representatives' needs, both on an aggregated and individualized basis, in order to further develop, customize and improve our Website based on the preferences, experiences and difficulties of Visitors;
- h) to communicate with and to contact Visitors and Client's Representatives in order to obtain feedback regarding the Website;
- i) to assess and manage your application and to communicate with you about your application as a candidate for an employment ;
- j) to disclose to third party vendors, service providers, contractors or agents who perform functions on our behalf with respect to the Website;
- k) to create aggregated statistical data and other aggregated and/or inferred Non-Personal Data, which we or our business partners may use to provide and improve our Website; and
- l) as otherwise authorized by Data Subjects.

5.2. We may use email addresses provided to us to contact Visitors and Clients' Representatives when necessary, including in order to send reminders or offers and to provide information and notices about the Website. At any time, Data Subjects may choose whether their Personal Data is to be used for sending such marketing materials which are not an essential part of the Services or the Website (opt out). Data Subjects may exercise their choice by contacting us at: [info@atidot.com](mailto:info@atidot.com).

## 6. HOW WE USE NON PERSONAL DATA

6.1. We may use information that is Non Personal Data for the same purposes we use Personal Data (where applicable) and in addition in order to:

- a) compile anonymous or aggregate information;
- b) disclose to third party vendors, service providers, contractors or agents who perform tasks on our behalf in connection with the Services provided through the Website;
- c) monitor and analyze use of the Website and for the technical administration and troubleshooting of the use of the Website; and
- d) provide us with statistical data
- e) marketing our Services, subject to appropriate consent being collected.

6.2. We may use third party analytics tools. These tools help us understand Visitors' behaviour on our Website a, including by tracking page content, and click/touch, movements, scrolls and keystroke activities. The privacy practices of these tools are subject to their own policies and they may use their own cookies to provide their services. For further information about cookies, please see Section 12 in this Policy. Further information about the option to opt-out of these analytics services is available at: [info@atidot.com](mailto:info@atidot.com).

6.3. From time to time, we may use additional or alternative analytics services. We will provide a notice of these changes on our Website.

6.4. We use anonymous, statistical or aggregated information, which may be based on extracts of Personal Data, for legitimate business purposes including for testing, development, improvement,

control and operation of the Website. We may share such information with our third party providers. It has no effect on Data Subject's privacy, because there is no reasonable way to extract data from the aggregated information that can be associated with a Data Subject. We will share Personal Data only subject to the terms of this Policy, or subject to Data Subject's prior informed consent.

## **7. THE LEGAL BASIS FOR USE OF PERSONAL DATA**

7.1. We will only Process Personal Data of Data Subjects where we have a legal basis to do so. The legal basis will depend on the reason or reasons we received and/or collected and need to use the Personal Data. In almost all cases the legal basis will be:

- a) To provide our Services under an agreement with a Client.
- b) To fulfill a legitimate interest that we have as a business.
- c) Because a Data Subject consented to us using its Personal Data for a particular purpose.

7.2. More information on each legal basis is provided below.

- a) Processing the Personal Data is required for performance of our contract with our Client and provision of our Services to the Client.
- b) Processing the Personal Data is required for fulfilling our or a third party's legitimate interests, for example: (1) we collect information about use of our Website in order to identify and prevent its abuse; (2) we use Personal Data to maintain and improve our Website by identifying Visitor and/or Client's Representatives' usage trends and technical issues.
- c) A Visitor or Client's Representative has consented to the Processing of its Personal Data for one or more specific purposes, for example: (1) if a Visitor provided its details under the "Contact Us" tab in our Website we will contact that Visitor in order to provide further information; (2) if a candidate provides its details in order to apply for employment with us, we will use his personal information to assess and manage his application .

7.3. It is hereby clarified that the legal bases detailed above are the legal bases for

processing of Personal Data carried out by us in accordance with the GDPR. If processing of Personal Data is subject to other Applicable Laws, then the legal basis for processing Personal Data may differ according to those Applicable Laws.

For more information, see Section “ 11YOUR RIGHTS” below.

## **8. SHARING INFORMATION WITH OTHERS**

8.1. We do not sell, rent or lease Personal Data. We may share Personal Data with service providers and other third parties, if necessary to fulfil the purposes for collecting the information, such as Wix, cloud vendors, subcontractors providing us processing services, etc., provided that any such third party will commit to protect privacy of Data Subjects as required under the Applicable Laws and this Policy.

8.2. Additionally, a merger, acquisition or any other structural change may require us to transfer Personal Data to another entity, provided that the receiving entity will comply with Applicable Laws and this Policy.

## **9. SHARING INFORMATION WITH AUTHORITIES**

We may need to disclose Personal Data in response to lawful requests by public authorities or law enforcement officials, including meeting national security or law enforcement requirements. We cooperate with government and law enforcement officials to enforce and comply with the law.

## **10. TRANSFER OF DATA OUTSIDE YOUR TERRITORY**

10.1. Your Personal Data is stored by Wix, the platform upon which our Website operates, in accordance with their privacy policy in effect from time to time, available at: <https://www.wix.com/about/privacy> (“Wix PP”). You are defined in the Wix PP as a “User of User”. Wix may store, process or maintain information in various sites worldwide, including through cloud based service providers worldwide. Wix PP provides that Personal Data of Users of Users, shall be transferred in accordance with one of the permitted mechanisms of the GDPR.

We may process your Personal Data in any country in which we do business, currently mainly the member states of the EU, Israel (a country declared by the EU Commission as an adequate country) or the US. If we shall transfer the

Personal Data of an EU resident outside of Israel or the EU we shall comply with Applicable Laws in relation to such transfer. To the extent that the laws in your jurisdiction require consent for the transfer of Personal Data outside your jurisdiction, by using our Website and providing us your Personal Data, you consent to such transfer. In such event, the Client is responsible to obtain the prior consent of the Client Customers and Client Insurance Agents as required under Applicable Law.

10.2. Data Subjects can obtain more details of the protection given to their Personal Data when it is transferred outside the EEA (including a copy of the standard data protection clauses which we have entered into with recipients of the Personal Data) by contacting us as described Section 18 **“CONTACT US”** below.

10.3.

## 11. YOUR RIGHTS

11.1. Data Subjects may have the following rights in relation to Personal Data we process and, in most cases, the Data Subject can exercise them free of charge. At any time, Data Subjects may contact us at: [info@atidot.com](mailto:info@atidot.com) and request to know what Personal Data we keep about them. We will make good-faith efforts to locate the Personal Data that Data Subjects request to access and comply with our obligations under Applicable Law in relation to Data Subject rights.

11.2. When a Data Subject asks us to exercise any of its rights under this Policy and the Applicable Laws, we may need to ask the Data Subject to i) provide us certain credentials to identify the Data Subject and to verify that the Data Subject is in fact who he/she claims to be, in order to prevent unauthorized and/or fraudulent requests for Personal Data; and ii) to ask the Data Subject questions to better understand the nature and scope of Personal Data that it requests to access.

11.3. We may redact from the Personal Data which we will make available to the Data Subject, any Personal Data related to others.

11.4. If you are a Client’s Customer or Client’s Insurance Agent, we Process your Personal Data as a Processor and therefore you must refer to the relevant Client in order to exercise your Data Subject rights. The decision-making power about compliance with a Data Subject rights requests issued by you as a Client’s Customer or as a Client’s Insurance Agent, resides with the Client, as the Controller. If you cannot get in touch with the relevant Client, you may contact us and we will make commercially reasonable efforts to assist you.

11.5. We may retain certain Personal Data as deemed required by us in accordance with applicable laws, or for legitimate business reasons, for the duration as required under applicable laws. In addition, we may delete any Personal Data pursuant to our policies, as in effect from time to time.

#### **Note to our Visitors and Client Representative in the EU:**

We hereby inform Visitors and Client Representatives in the EU whose Personal Data we may Process, (in this section “You”, “Your”), of the following rights (by virtue of EU Privacy Laws) with respect to the Processing of your Personal Data:

- **Right to access:** You may have the right to request a review of your Personal Data held by Atidot.
- **Right to rectification:** if the Personal Data Processed by Atidot is incorrect, incomplete or not Processed in compliance with Applicable Law or this Privacy and Cookie Policy, You may have the right to have your Personal Data rectified.
- **Right to erasure:** under certain conditions, You may be entitled to require that Atidot will delete or "block" your Personal Data (e.g. if the continued Processing of a specific data is not justified or if the lawful basis for Processing is consent).
- **Right to Portability:** under certain conditions, You may have the right to transfer the Personal Data that you have provided to us between data Controllers (i.e. to transfer your Personal Data to another entity).
- **Right to object:** where that lawful basis for Processing Your Personal Data is "legitimate interests", those lawful bases are not absolute, and You may have a right to object to such Processing.
- **Right to withdraw consent:** If the Processing of your Personal Data is based on Your consent, You have the right to withdraw Your consent to such processing at any time.
- **The right to restrict Processing** – under certain circumstances, You may have the right to object to the Processing of your Personal Data due to your particular situation.
- **Right to lodge a complaint:** You have the right to lodge a complaint before the relevant data protection authority or supervisory authority of Your jurisdiction.

are a Data Subject in another jurisdiction - other rights may apply.

**Exercise these rights, where applicable, please refer to Section CONTACT US” of “ 18 .this Policy**

## **12. COOKIES**

12.1. In this section, “You” shall mean a Visitor.

12.2. A cookie is a small data file stored on your browser or device. When you access or use our Website, Atidot uses “cookies” to keep track of the settings users have

selected and actions they have taken on our Website, as provided by Wix, the platform upon which the Website is based. Cookies store certain information on the browser or hard drive of your computer and/or your mobile device (“**Local Storage**”) and allow us to improve Your user experience and other capabilities on our Website, monitor and analyze the performance of the Website, assist Wix in operation and effectiveness of Wix’s platform, and ensure our Website and the Wix platform are secure and safe to use. For more information about the cookies used on our Website please see: <https://support.wix.com/en/article/cookies-and-your-wix-site#types-of-cookies>.

12.3. Most devices and browsers will allow you to erase cookies or block acceptance of cookies, or receive a warning before a cookie is stored. Please note that unless you block the acceptance of cookies, the Website will utilize cookies upon your use of the Website (unless it is required by Applicable Laws to provide a separate consent to use such cookies, and in which case We will use such cookies only after we receive your separate consent to such use and subject to your right to withdraw such consent at any time). For more information please see: <https://www.allaboutcookies.org/>.

## 13. DATA SECURITY

13.1. We take the safeguarding of the Personal Data very seriously, and use a variety of systems, applications and procedures to protect the Data from loss, theft, damage or unauthorized use or access when it is in our possession or control, including reasonable physical, technical and organizational measures which restrict access to the Personal Data. These measures provide sound industry standard security. However, although we make efforts to protect privacy, we cannot guarantee that

the Website will be immune from any wrongdoings, malfunctions, unlawful interceptions or access, or other kinds of abuse and misuse.

- 13.2. We also regularly monitor our systems for possible vulnerabilities and attacks, and regularly seek new ways and for further enhancing the security of our Website and protection of our Data Subject's privacy.
- 13.3. Data Subjects should take steps to protect against unauthorized access to their password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping log-in and password credentials private. In addition, Data Subjects should take steps to protect against unauthorized access to Personal Data stored on their premises as well as defining limited access rights to such Personal Data on a need to know basis.
- 13.4. If a Data Subject receives an e-mail asking it to update its information with respect to the Website, it should not reply and should contact us at [info@atidot.com](mailto:info@atidot.com).
- 13.5. Atidot will comply with Applicable Laws in the event of any Personal Data Breach and will inform Data Subjects of such Breach if required by Applicable Laws.

#### **14. DATA RETENTION**

- 14.1. We retain different types of information for different periods, depending on the purposes for processing the data, our legitimate business purposes as well as pursuant to legal requirements under the Applicable Law. We may retain Personal Data for as long as necessary to support the collection and the use purposes under this Policy and for other legitimate business purposes, for example, for storing data, for documentation, for cyber-security management purposes, legal proceedings and tax issues.
- 14.2. We may store aggregated Non Personal Data without time limit. In any case, as long as a Data Subject uses the Website or we will keep information about that Data Subject, unless we are legally required to delete it, or if that Data Subject exercises its rights to delete the Personal Data.

#### **15. OUR POLICY TOWARD CHILDREN**

- 15.1. Our Website are not meant to be used by or for persons under 18, as such, we do not knowingly collect Personal Data from minors younger than 18. Insofar as Personal Data may be collected on the Website based on a Data Subject's consent, the Data Subject must be above the age of 16 (or above the age of 13 if this is the legal requirement in your country). If these age requirements are not met, the Data Subject is required to obtain the consent of the parent or guardian to provide and

process Personal Data in accordance with this Policy; lacking such consent, the Data Subject should not use the Website.

- 15.2. Within the provision of our Services and the operation of our Solution, we may receive Personal Data of children related to Client Customers, which may appear in Client Data Sets provided to us by our Clients. The disclosure of the Personal Data of children to us subject to our Client confirming it has obtained the Personal Data lawfully and is disclosing it to us subject to explicit consent of the Client's Customer (or parent or legal guardian), to the extent necessary according to Applicable Laws.

## **16. CHANGES TO THIS PRIVACY POLICY**

- 16.1. We may change the terms of this Privacy Policy from time to time by posting notice on our Website, with a seven (7) day advance notice. However, substantial changes will be effective thirty (30) days after the notice was initially posted. We will make an effort to inform Client Representatives of substantial changes through the channels of communication generally used in such circumstances, and subject to the requirements of applicable laws - to obtain their consent. The Client is responsible to notify its Customers and Insurance Agents of such changes and obtain their consent, if required under Applicable Law.
- 16.2. If we need to adapt the Policy to legal requirements, the amended Policy will become effective immediately or as required.
- 16.3. A Data Subject's continued use of the Website following such notice shall constitute the consent of the Data Subject to any changes made and a waiver of any claim or demand in relation to such changes. If a Data Subject does not agree to the new or different terms, it should not use and is free to discontinue using the Website (however, discontinuation of use of this subject to any contractual obligations the Client may have towards Atidot).

## **17. CONTACT US**

- 17.1. For further information about this Policy, please contact our VP data and actuary at [Info@Atidot.com](mailto:Info@Atidot.com)
- 17.2. We work hard to manage Personal Data responsibly. If you are unhappy about the way we do this, please contact us and we will make good-faith efforts to address your concerns. We are usually able to resolve privacy questions or concerns promptly and effectively. If you are not satisfied with the response you receive from us, you may escalate concerns to the applicable privacy regulator in your jurisdiction. Upon request, we will provide you with the contact details for that regulator.

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