

## Privacy Policy

THIS PRIVACY POLICY REFERS TO CUSTOMERS, SYSTEM USERS & END-USERS.

### 1. Privacy statement

Beezer Technologies Ltd. an Israeli based Company (hereinafter: **"The Company"**, **"We"**), develops and operates the system- "Solitics" - a data management platform (**"Solitics"**, **"Platform"**) and the Solitics website: [www.solitics.com](http://www.solitics.com) (hereinafter: **"the Website"**). Solitics provides business-intelligence, and targeted-marketing services to its customers. Solitics processes and analyzes users-data which is gathered from the customer's assets such as: Mobile app, Websites, CRM, trading & gaming platforms, VOIP etc. (hereinafter: "Customer's Platform").

We take the privacy of your Personal Data seriously. Therefore, we use only the necessary data to provide our services and fulfil our obligations by contract with our customers, third parties or by laws & regulations.

This Privacy Policy sets our policy with respect to information that can be associated with or which relates to a person and/or could be used to identify a person such as name, identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (**"Personal Data"**).

"Non-Personal Data" as used in this Privacy Policy is therefore any information that does not relate to a person and/or cannot be used to identify a person.

We may also use Non-Personal Data. The limitations and requirements in this Privacy Policy on our gather, use, disclosure, transfer and storage/retention of Personal Data do not apply to Non-Personal Data.

### 2. Personal data that we use

2.1. Solitics automatically gathers data from its customer's assets, and use only the necessary data to provide its services. Therefore, we might receive and process personal data that:

- 2.1.1. You voluntarily provide; and/or
- 2.1.2. Give your consent to collect and process it; and/or
- 2.1.3. The processing is necessary to meet contractual obligations entered into by you and our customers; and/or
- 2.1.4. Processing is necessary to comply with legal obligations of our customers; and/or
- 2.1.5. Processing is for the purposes of legitimate interests pursued by our customers.

IF YOU HAVE A REASONABLE BASIS TO ASSUME OR YOU KNOW THAT ANY OF THE ABOVE MENTIONED IS NOT MET, YOU ARE REQUIRED TO INFORM US, WITHOUT DUE DELAY, BY SENDING US AN EMAIL TO: [privacy@solitics.com](mailto:privacy@solitics.com)

2.2. The types of data that we may receive is vary from customer to customer and may include your:

**2.2.1. Personal & contact data such as:** Name, Address, Phone no., mobile no., personal-email, physical-address;  
**Demographic data such as:** age, gender, country, and preferred language; **Financial Data such as:** financial state, account balance; User behavior data: marketing preferences, user interactions with customer's services/products; Location data; cookies;

**2.2.2. Credentials:** We collect passwords, password hints, and similar security information used for authentication and account access;

**2.2.3. Customer service:** We also collect information you provide us and the content of messages you send us, such as service request, feedback and product reviews you write, or questions and information you provide for customer support.

**2.3. Cookies Policy:** Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies are widely used by website owners in order to make their websites work, or to work more

efficiently, as well as to provide reporting information. In some cases, our customers may use cookies that are required for the processing of your data by Solitics.

YOU MAY BLOCK OR DELETE COOKIES BY CHANGING YOUR BROWSER SETTINGS, BUT YOU MAY NOT BE ABLE TO USE THE WEBSITE OR SOME WEBSITE FEATURES.

### 3. How we use your personal data

**3.1. We use the Personal Data in a manner that is consistent with this Privacy Policy and applicable laws and regulations.**

We may use the Personal Data as follows:

- 3.1.1. Processing and Analyzing:** In order to provide our services, we may use the Personal data for processing and analyzing purposes.
- 3.1.2. Certain purpose:** If you provide Personal Data for a certain purpose, we may use the Personal Data in connection with the purpose for which it was provided. For instance, if you contact us by e-mail, we will use the Personal Data you provided to answer your question or resolve your problem and will respond to the email address from which the contact came.
- 3.1.3. Use or Access:** If you provide Personal Data in order to obtain access to or use of the Website or Platform or any functionality thereof, we will use your Personal Data to provide you with access to or use of the Website, or Platform or functionality and to monitor your use.
- 3.1.4. Internal-Business Purpose:** We may use your Personal Data for internal business purposes, including without limitation, to help us improve the content and functionality of the Platform and Website to better understand our Customers and Users, to improve the Platform or Website, to protect against, identify or address wrongdoing, to enforce our Terms of Use and this Privacy Policy, to manage your account and registration and provide you with customer service, and to generally manage the Platform or Website and our business.
- 3.1.5. Messaging tool:** Our Platform contains automated personalized messaging tool which enables sending messages to users/consumers by several messaging platform i.e. SMS, Email, Facebook, web-push, Call-Centers, Push-notifications etc. The Platform uses the user's personal data (email address, phone number, social network account etc.), for sending messages via these channels. IF YOU DO NOT WANT TO RECEIVE MESSAGES ANYMORE OR IF YOU WISH TO OPT-OUT FROM ELECTRONIC COMMUNICATIONS YOU ARE REQUIRED TO CONTACT YOUR SERVICE PROVIDER.
- 3.1.6. Marketing Purpose:** Our customers may use your personal data for marketing purposes. For instance, they may contact you directly via email or SMS for marketing and advertising proposes ("**Direct Marketing**"). In order to receive direct marketing, you need to provide your specific consent. IF BY MISTAKE YOU RECEIVE DIRECT MARKETING WITHOUT YOUR SPECIFIC CONSENT AND/OR WISH TO OPT-OUT, YOU ARE REQUIRED TO CONTACT YOUR SERVICE PROVIDER.
- 3.1.7. Security and Dispute Resolution:** We may use Personal data to protect the security of our Platform, to detect and prevent fraud, fishing, identity theft, data leakage, to confirm the validity of software licenses, to resolve disputes and enforce our agreements.
- 3.1.8. Data Retention, Archives:** In the interests of the customer, we retain and archive Personal data as long as it necessary to obtain our services, meet with contractual obligations, laws and regulations and subject to our retention policies and this Privacy Policy. Such cases are pre-defined by contract with our customer. Any related data transaction is securely controlled by different means of cyber security methods.

**3.2. Transfer/Share/Disclose Data:** We may share your Personal Data with our contractors and service providers who process Personal Data on behalf of the Company to perform certain business-related functions. While we do so we make sure that they will be bound to maintain that Personal Data in accordance with this Privacy Policy.

**3.3. Cloud Services:** We may need to share personal data among our cloud service. For example, assist in protecting and securing our Platform the cloud service admin may need access to personal data to provide those functions. In such

cases, the cloud service supplier must abide by our data privacy and security requirements and are not allowed to use personal data they receive from us for any other purpose.

- 3.4.** We may need to **share some personal data among our development and customer service team**. For example, to provide customer service and support or assist in protecting and securing our systems and services our development and customer service team may have access to personal data. In such cases, our personnel must abide by our data privacy and security requirements and policy and are not allowed to use personal data for any other purpose.
- 3.5.** In the event of a **corporate sale, merger, reorganization, dissolution or similar event**, Personal Data may be part of the transferred assets. Any successor or acquirer of the Company (or its assets) will continue to process your Personal Data and other information in accordance with the terms of this Privacy Policy. In case you have any claims in this regard, please contact [privacy@solitics.com](mailto:privacy@solitics.com).
- 3.6.** We may disclose your Personal Data if required to do so by law in order to (for example) respond to a subpoena or request from law enforcement, a court or a government agency (including in response to public authorities to meet national security or law enforcement requirements), or in the good faith belief that such action is necessary to (a) comply with a legal obligation, (b) protect or defend our rights, interests or property or that of third parties, (c) prevent or investigate possible wrongdoing in connection with the Services, (d) act in urgent circumstances to protect the personal safety of Users of the Services or the public, or (e) protect against legal liability.
- 3.7. Other Purposes:** If we intend to use any Personal Data in any manner that is not consistent with this Privacy Policy, you will be informed of such anticipated use prior to or at the time the Personal Data is processed.

## 4. How We Store Your Personal Information, transfer your data to 3<sup>rd</sup> parties and to non-EEA countries.

- 4.1.** As a cloud based Platform, Solitics uses the Amazon Cloud Services which comply with the GDPR and is ISO 27001, 27017,27018 certified (for AWS full statement see <https://aws.amazon.com/blogs/security/all-aws-services-gdpr-ready/>). Solitics stores all the gathered data including its backups at AWS cloud services in Ireland region (eu-west-1).
- 4.2.** In order to deliver our services, personal data may be transferred by Solitics to customers' service providers (i.e. email exchange servers services, SMS providers etc.) ("Customer's Suppliers"). We transfer only the minimum data that is necessary for conducting our customer's services. The data is transferred only to suppliers approved by our customers and by their specific requests and approval. Though we do not have a legal obligation to do so, from time to time and randomly, we review our customer's suppliers to make sure that they allow compliance with GDPR. These do not derogate from our customers' responsibility to work only with suppliers that enable the customer to comply with the GDPR.
- 4.3.** Solitics have no indication over the processing location of our customers' providers. Hence, personal data may be transfer by Solitics to providers that stores and processes the personal data in countries outside the EU or European Economic Area (EEA). Such transfer may include countries that do not ensure adequate level of data protection laws as required by EU privacy laws. For verifying that your data is only stored and processed in the European Economic Area, please contact your service provider.
- 4.4.** Solitics implements high level information security technics & technical measures, and/or third parties contractual obligations to maintain its 3<sup>rd</sup> party Information security level adequate to Solitics level.
- 4.5.** We may transfer Personal data to Israel where we maintain our facilities. Israel is considered by the EU as having adequate data protection law.

## 5. Security of personal data

- 5.1.** Solitics is committed to protecting the security of any personal data on its database and network. We use a variety of security technologies and procedures to help protect all personal data from loss, misuse, unauthorized use, access, inadvertent disclosure, alteration and destruction. However, no network, server, database or Internet or e-mail

transmission is ever fully secured or error free. Therefore, you should take special care in deciding what information you disclose.

- 5.2. We also implement security and privacy by design technics on Solitics. For Example, by default, only certain authorized persons have the access to direct identifiable information i.e. Name, email, phone number of the data subject etc.

## 6. Accessing, Updating, Correcting, Deleting, restriction of processing, lodge a complaint with a supervisory authority rights.

- 6.1. You may have the right to request access to some of your Personal Data being stored by us. You can also ask to correct, update or delete any inaccurate Personal Data that we process about you. All subject to our policies and the applicable laws and regulations. In order to exercise these rights, prior contacting us, please contact your service provider. You can contact us at: [privacy@solitics.com](mailto:privacy@solitics.com)
- 6.2. Our Platform enables our customers to view, edit, or delete their/data subject personal-data online, by their sole decision. Solitics does not have any liability when using these functions. In order to exercise these rights, prior contacting us, please contact your service provider. You can contact us at: [privacy@solitics.com](mailto:privacy@solitics.com). We will respond to requests to access or delete your personal data within 30 days.
- 6.3. We may retain your Personal Data for a period permitted or required under applicable laws. Even if we delete your Personal Data it may persist on backup or archival media for an additional period of time due to technical issues or for legal, tax or regulatory reasons or for legitimate and lawful business purposes.
- 6.4. Our Platform enables our customers to restrict the processing of data belongs to data-subjects. Solitics does not have any liability when using these functions.  
You may have the right to restriction of processing if one of the following applies:
  - 6.4.1. The accuracy of the personal data is contested by the data subject;
  - 6.4.2. The processing is unlawful, and the data subject opposes the erasure of the personal data, and requests the restriction of their use instead;
  - 6.4.3. Your service provider no longer needs the personal data for the purposes of the original processing, but the data is required by the data subject for the establishment, exercise or defense of legal claims;
  - 6.4.4. The data subject has objected to processing pending the verification whether the legitimate grounds of the service provider override those of the data subject.

In order to exercise these rights, prior contacting us, please contact your service provider. You can contact us at: [privacy@solitics.com](mailto:privacy@solitics.com)

- 6.5. You may have the right to lodge complaint with a supervisory authority. However, prior doing so, you welcome to contact us by email to [privacy@solitics.com](mailto:privacy@solitics.com) in order to solve the issue for the benefit of all parties. Our supervisory authority is the Israeli Data Protection authority.

## 7. General

- 7.1. This Privacy Policy does not apply to any Personal Data that you provide to another customer, End-user or User through the Platform or Website or through any other means.
- 7.2. This Privacy Policy applies only to the Platform and Website. It is not applying to third party's websites or services which their links may be contain in the Website or Platform. The links from the Website or platform do not imply that we endorse or have reviewed the third-party websites or services. We suggest contacting these third party directly for information on their privacy policies.
- 7.3. **Children: Our services are not intended for processing minors (under the age of 18) or children's (under the age of 13) data.** We do not knowingly receive Personal Data from minors or children. If you are a minor or a child or collect Personal data from minors or children, please do not submit any Personal Data through the Website or Platform without the minor/child's parental/custodian's approval. If you have reason to believe that we process a

minor or a child Personal Data without its parental/custodian's approval, you are required to notify us by email to [privacy@solitics.com](mailto:privacy@solitics.com) , and we will endeavor to delete that information from our databases.

## 8. CHANGE IN TERMS

**Solitics** reserves the right to change or modify this Privacy Policy at any time and at its sole discretion. Any changes or modifications will be effective immediately upon posting the revisions to the Website or Platform.

## 9. Dispute Resolution.

If you have a complaint about Solitics' privacy practices you should write to us at: [privacy@solitics.com](mailto:privacy@solitics.com). We will take reasonable steps to work with you to attempt to resolve your complaint.