

PRIVACY POLICY
Last Updated: September 6, 2023

This privacy policy (“**Privacy Policy**”) governs how we, Sightfull Insights Ltd. (“**Sightfull**” “**we**”, “**our**” or “**us**”) use, collect, and store Personal Data we collect or receive from or about you (“**you**”) such as in the following use cases:

- (i) When you browse or visit our website, <https://www.sightfull.com/> (“**Website**”);
- (ii) When you make use of, or interact with, our Website
 - a. When you contact us (e.g. customer support, need help, submit a request)
 - b. When we process your job application
- (iii) When you make use of, or interact with, our App, and any other software application, that we license (each individually, and collectively, the “**App**”).
 - a. When you create an account and when you log in
 - b. When you are using our App
- (iv) When you attend a marketing event and/or we exchange business cards and you provide us with your Personal Data
- (v) When we acquire your Personal Data from third-party sources (such as lead-generation companies)
- (vi) When we use the Personal Data of our customers (e.g. contact details)
- (vii) When we use the Personal Data of our resellers, distributors, agents and/or finders (e.g. contact details)
- (viii) When you interact with us on our social media profiles (e.g., Instagram, Twitter, LinkedIn)

Please read this Privacy Policy carefully, so you can understand our practices and your rights in relation to personal data. “**Personal Data**” means any information that can be used, alone or together with other data, to uniquely identify any living human being and any information deemed as Personally Identifiable Information by privacy laws. Please note that this is a master privacy policy and some of its provisions only apply to individuals in certain jurisdictions. For example, the legal basis in the table below is only relevant to GDPR-protected individuals. **Important note:** Nothing in this Privacy Policy is intended to limit in any way your statutory right, including your rights to a remedy or means of enforcement.

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This Privacy Policy can be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy. If we implement significant changes to the use of your Personal Data in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

1. WHAT PERSONAL DATA WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

Specific Personal Data we collect	Why is the Personal Data collected	Legal basis (GDPR only, if applicable)	Third parties with whom we share your Personal Data	Consequences of not providing the Personal Data
When you browse or visit our Website				
Cookies, analytic tools and log files For more information, please read our cookies policy https://www.sightfull.com/cookies-policy	<ul style="list-style-type: none"> • Understand the usage of our Website • To provide you with a better service and features 	Consent Legitimate interest (e.g. essential cookies)	N/A	Certain non-essential Website features may not be available
When you make use of, or interact with, our Website				
When you contact us (e.g., customer support, need help, submit a request)				
<ul style="list-style-type: none"> • Email address • Any other Personal Data you decide to provide us with 	<ul style="list-style-type: none"> • To process and answer questions • To customize your experience 	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract Legitimate interest (e.g. respond to a query sent by you)	3 rd party platforms such as for the following purposes: <ul style="list-style-type: none"> • Hubspot • Salesforce 	<ul style="list-style-type: none"> • Cannot assist you and respond your query • Cannot customize your experience
<ul style="list-style-type: none"> • Full name • Email address 	<ul style="list-style-type: none"> • To send you marketing communications 	Consent	3 rd party platforms such as for the following purposes: <ul style="list-style-type: none"> • Hubspot 	<ul style="list-style-type: none"> • Cannot send you marketing communications
When we process your job application				
<ul style="list-style-type: none"> • Full name • Email address • Phone number • Resume/CV • Any other Personal Data you decide to provide us with 	<ul style="list-style-type: none"> • To process your job application • To assess you as a candidate • To communicate with you for job application-related matters 	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract Legitimate interest (e.g. process your job application)	3 rd party platforms such as for the following purposes: <ul style="list-style-type: none"> • Workable 	<ul style="list-style-type: none"> • Cannot process your job application • Cannot assess your suitability as a candidate • Cannot communicate with you for job application-related matters
When you make use of, or interact with, our App				
When you create an account and when you log in				
<ul style="list-style-type: none"> • IP Address • Email address • Full name • Country 	<ul style="list-style-type: none"> • To create an account • To authenticate you or your account • To grant you access to the App 	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. Legitimate interest (e.g., to provide a service)	3 rd party platforms such as for the following purposes: <ul style="list-style-type: none"> • Auth0 • Intercom 	<ul style="list-style-type: none"> • Cannot allow you to create an account • Cannot verify your account • Cannot grant you access to the App
When you are using our App				
Usage information	<ul style="list-style-type: none"> • Understand the usage of our App 	Consent	N/A	<ul style="list-style-type: none"> • Cannot understand your usage of our App

	<ul style="list-style-type: none"> To provide you with a better service and features 			<ul style="list-style-type: none">
When you attend a marketing event and/or we exchange business cards and you provide us with your Personal Data				
<ul style="list-style-type: none"> Full name Email address Company name Job position Phone numbers Any other data you decide to provide/supply us with 	<ul style="list-style-type: none"> To establish a business connection To send you more information about us and marketing communications 	Depending on the context, our legal basis for collecting this information is legitimate interest (e.g., to establish a business connection with you), or pre-contractual discussions or consent	3 rd party platforms such as for the following purposes: <ul style="list-style-type: none"> Hubspot Outreach 	<ul style="list-style-type: none"> Cannot establish a business connection Cannot send you more information about us and marketing communications
When we acquire your Personal Data from third-party sources (such as lead-generation companies)				
<ul style="list-style-type: none"> Contact details 	<ul style="list-style-type: none"> To establish a business connection To send you more information about us and marketing communications 	Depending on the context, our legal basis for collecting this information is legitimate interest (e.g., to establish a business connection with you) or consent	3 rd party platforms such as for the following purposes: <ul style="list-style-type: none"> Hubspot Outreach 	<ul style="list-style-type: none"> Cannot establish a business connection Cannot send you more information about us and marketing communications
When we use the Personal Data of our customers (e.g. contact details)				
<ul style="list-style-type: none"> Full name Email address Company name Job position Phone number Any other data you decide to provide/supply us with 	<ul style="list-style-type: none"> To provide our products and services To perform the applicable agreement 	Processing is necessary for the performance of a contract to which our customer is a party. Compliance with a legal obligation (e.g. tax laws, bookkeeping laws, etc.).	3 rd party platforms such as for the following purposes: <ul style="list-style-type: none"> Hubspot Outreach Salesforce Sendgrid 	<ul style="list-style-type: none"> Cannot provide the services and/or our products Cannot perform the agreement
When you interact with us on our social media profiles (e.g., Instagram, Twitter, LinkedIn)				
<ul style="list-style-type: none"> Full name Email address Any other type of Personal Data that you decide to share with us 	<ul style="list-style-type: none"> To reply and/or respond to your request or question 	Depending on the context, our legal basis for collecting this information is legitimate interest (e.g., to establish a business connection with you), or pre-contractual discussions or consent	N/A	<ul style="list-style-type: none"> Cannot reply and/or respond to your request or question

Finally, please note that some of the abovementioned Personal Data will be used for detecting, taking steps to prevent, and prosecution of fraud or other illegal activity, to identify and repair errors, to conduct audits, and for security purposes. Personal Data may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims. In certain cases, we may or will anonymize or de-identify your Personal Data and further use it for internal and external purposes, including, without limitation, to improve the services and for research purposes. “**Anonymous Information**” means information which does not enable identification of an individual user, such as aggregated information about the use of our services. We may use Anonymous Information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them).

2. HOW WE PROTECT AND RETAIN YOUR PERSONAL DATA

- 2.1. **Security.** We have implemented appropriate technical, organizational and security measures designed to protect your Personal Data. However, please note that we cannot guarantee that the information will not be compromised as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.
- 2.2. **Retention of your Personal Data.** Your Personal Data will be stored until we delete the record and we proactively delete it or you send a valid deletion request. please note that in some circumstances we may store your Personal Data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings. We have an internal data retention policy to ensure that we do not retain your Personal Data perpetually. Regarding retention of cookies, you can read more in our cookie policy <https://www.sightfull.com/cookies-policy>.

3. HOW WE SHARE YOUR PERSONAL DATA

In addition to the recipients described above, we may share your Personal Data as follows:

- 3.1. With our business partners with whom we jointly offer products or services. We may also share Personal Data with our affiliated companies.
- 3.2. To the extent necessary, with regulators, courts or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- 3.3. If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your Personal Data to such third party (whether actual or potential) in connection with the foregoing events;
- 3.4. In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your Personal Data in connection with the foregoing events, including, in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company; and/or
- 3.5. Where you have provided your consent to us sharing or transferring your Personal Data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality).

4. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL DATA

- 4.1. **Storage:** We store the Personal Data with the following storing companies: AWS U.S in various locations; AWS – Europe in various locations.
- 4.2. **Internal transfers:** Transfers within the Sightfull group will be covered by an internal processing agreement entered into by members of the Sightfull group (an intra-group data processing agreement) which contractually obliges each member to ensure that Personal Data receives an adequate and consistent level of protection wherever it is transferred to.
- 4.3. **External transfers:** Where we transfer your Personal Data outside of EU/EEA (for example to third parties who provide us with services), we will generally obtain contractual commitments from them to protect your Personal Data. When Sightfull engages in such transfers of Personal Data, it relies on i) Adequacy Decisions as adopted by European Commission on the basis of Article 45 of Regulation (EU) 2016/679 (GDPR) (for example, when we access from Israel), or ii) Standard Contractual Clauses issued by the European Commission. Sightfull also continually monitors the circumstances surrounding such transfers in order to ensure that these maintain, in practice, a level of protection that is essentially equivalent to the one guaranteed by the GDPR.

5. YOUR PRIVACY RIGHTS.

- 5.1. **Rights:** The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by the GDPR):
 - o You have a right to access Personal Data held about you. Your right of access may normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
 - o You have the right to request that we rectify any Personal Data we hold that is inaccurate or misleading;
 - o You have the right to request the erasure/deletion of your Personal Data (e.g. from our records). Please note that there may be circumstances in which we are required to retain your Personal Data, for example for the establishment, exercise or defense of legal claims;
 - o You have the right to object, to or to request restriction, of the processing;

- You have the right to data portability. This means that you may have the right to receive your Personal Data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
- You have the right to object to profiling;
- You have the right to withdraw your consent at any time. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations. Also, please note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal;
- You also have a right to request certain details of the basis on which your Personal Data is transferred outside the European Economic Area, but data transfer agreements and/or other details may need to be partially redacted for reasons of commercial confidentiality;
- You have the right to delete your account in accordance with the terms set out in the relevant master service agreement you have signed with us; and
- You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place of work or place of alleged infringement) at any time or before the relevant institutions in your place of residence. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority and/or relevant institution.

5.2. You can exercise your rights by contacting us at privacy@sightfull.com. You may use an authorized agent to submit a request on your behalf if you provide the authorized agent written permission signed by you. To protect your privacy, we may take steps to verify your identity before fulfilling your request. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

6. **USE BY CHILDREN.** We do not offer our products or services for use by children and, therefore, we do not knowingly collect Personal Data from, and/or about children under the age of eighteen (18). If you are under the age of eighteen (18), do not provide any Personal Data to us without involvement of a parent or a guardian. For the purposes of the GDPR, we do not intend to *offer information society services directly to children*. In the event that we become aware that you provide Personal Data in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at privacy@sightfull.com.

7. **INTERACTION WITH THIRD PARTY PRODUCTS.** We enable you to interact with third party websites, mobile software applications and products or services that are not owned or controlled by us (each a “**Third Party Service**”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect Personal Data from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

8. ANALYTIC TOOLS

- **Google Analytics.** The Website uses a tool called “**Google Analytics**” to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with Personal Information we collect. Google’s ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <https://marketingplatform.google.com/about/analytics/terms/us/>, 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/>.
- **Mixpanel.** We collect on our App Personal Data such as your email address and your user activity through the use of Mixpanel. Mixpanel’s ability to use and share information is governed by the Mixpanel Terms of Use, available at <https://mixpanel.com/terms/>, and the Mixpanel Privacy Policy, available at <https://mixpanel.com/privacy/>. You can opt-out of Mixpanel’s services by clicking on the following link: <https://mixpanel.com/optout/>.
- **Hotjar.** The App uses Hotjar in order to better understand our users’ needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don’t like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users’ behavior and their devices. This includes a device’s IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our App. Hotjar stores this information in a pseudonymized user profile. Hotjar is contractually forbidden to sell any of the data collected on our behalf. For further details, please see Hotjar’s privacy policy at <https://www.hotjar.com/legal/policies/privacy/>. You can opt-out to the creation of a user profile, Hotjar’s storing of data about your usage of our App and Hotjar’s use of tracking cookies on other websites on this link <https://www.hotjar.com/legal/compliance/opt-out/>.
- **Twik.io.** Twik.io is an autonomous personalization platform, which increases conversions without increasing traffic. No configuration, no coding, and no editing is required. Twik’s user profiler and cookie-less tracking solutions enable accurate and real-time user profiling for personalized shopping experiences and deep customer insights. Twik Technologies Ltd. offers a technology that uses adaptive, multivariate testing to allow to deliver customized content to users and to analyze data about your users and additional tools services through the website. Twik’s terms of service <https://www.twik.io/terms/> and privacy notice <https://www.twik.io/privacy/>. Data Processing Agreement (“DPA”), is available at www.twik.io/terms/dpa

We reserve the right to remove or add new analytic tools.

9. **CONTACT US.** If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us privacy@sightfull.com.