# Privacy Policy

Aliyoop Ltd. ("**Aliyoop**" or "**We**") is committed to maintaining the privacy of its Customer and End Users (as described below). The following information describes how Aliyoop collects and processes information about you when you use our Platform and Services (as described below).

Our Privacy Policy explains:

- What information we collect and why we collect it.
- How we use that information.
- How we secure your information.
- Your rights with regard to the collection of such information.

By using our Platform and Services, you agree to this Privacy Policy.

Aliyoop provides a SaaS customer communication platform (the "**Platform**") which allows its customers ("**Customer User**") to deliver a personalized and targeted cross-channel experiences to their end-users ("**End-Users**"), by providing them with a full suite of solutions for messengers and web chatbots, click-to-chat ads, interactive forms & wizards, e-commerce and gamification (the "**Services**"). The Platform provides information about Aliyoop and its Services and enables its Customer Users to utilize the Services and to contact Aliyoop with respect to the Services.

#### **Collecting Information**

Please note that the scope of this Privacy Policy is limited only to information collected by Aliyoop through your use of its Platform and Services. Some information may be automatically collected, and some is collected when you interact with our Platform and Services. The type of information that may be automatically collected is non-personal information, which includes your session durations, the content you accessed on the Platform or Services, the frequency and scope of your use of the Platform and Services and information about your computer and internet connection including the operating system you use and browser type. Please note that the type of information that may be collected when you interact with the Platform also includes information you upload when you provide your services via the Platform to your End Users.

Information from which you can be personally identified may also be collected, including but not limited to your name, address, email address, telephone number, and the location of the computer through which you used the Platform or Services (hereinafter: "**Personal Information**"). Personal Information shall be collected only if received voluntarily from you, including, without limitation, via the following ways:

#### **Customer Personal Information**

#### a. Booking a Demo

If you wish to book a demo, we will collect your full name, email address, phone number, company name, job title, and the content you submitted to facilitate your demo.

# b. Create an Account

If you register to create a Aliyoop account ("**Account**"), we will collect your Personal Information, such as your full name, email address, username and password, and company name, to enable you to create an account on the Platform.

#### c. Contact Form

If you wish to contact us for support regarding our Services, Platform, this Privacy Policy or any other matter, we will collect your full name, email address, phone number, company name, and the content you submitted to facilitate your inquiry.

# d. Newsletter

If you wish to register to our newsletter and be provided with information on the Platform and Services, subject to your consent, we will collect your email address, and will send you the required materials.

#### e. Billing Information

If you wish to use paid Platform features, we will collect your billing address and credit card information. Your credit card information is stored by an approved payment provider.

#### f. KYC (Know YOUR Client) Form

If you wish to use the Platform's e-commerce capabilities to sell products to your End Users, we will collect required information about your business, such as the description of your business activity, business address and Personal Information of the business owners & decision makers.

# End User Personal Information

In order to provide the Service, Aliyoop collects and stores End User information as specified below:

a. <u>Uploaded information by the Customer User</u>

The Customer User may upload End User Personal Information, such as the End User's email, birthday, End User segment and other data so the Platform can enable a communication channel between the Customer User and the End User as well as offer a personalized experience.

#### b. Messenger date

Some messengers (ex, Facebook Messenger) provide information about the End User, when the End User opts-in and connects with the Customer User on the messenger. Information such as First and Last name, language, gender and timezone, to enable conducting a conversation.

c. <u>Conversations between Customer and End User</u>

The conversations between Customer User and End User are processed to provide the intended Service, including all activity in the chat, such as button clicks, URL clicks, conversation duration and other conversation statistics.

#### d. Payment Information

In order to support payments made by End Customer, we will collect via the Platform the End User's billing address, email address and credit card information of the End User. Please note, that sensitive payment information will be collected by an approved payment provider who assures that such information is protected according to a strict security standard.

# e. <u>e) E-Commerce Activity</u>

We collect via the Platform certain information regarding e-commerce activity associated with a respective End User. Such information includes, without limitation, purchased product, products viewed, clicked, added to cart and other statistics.

Please note that with regard to information collected when providing our Services to Customer Users, any notification requirements towards End-Users shall apply on the respective Customer User, and all to the extent required under the applicable law.

# Use of Information

We use the Personal Information we collect from you for a range of different business purposes according to different legal bases of processing. We may use or process your Personal Information for the following purposes. One or more purposes may apply simultaneously.

# 1. Providing the Requested Services

- We collect Personal Information included in the end-to-end Customer User and End-User communication process, to provide Customer Users with the Services they contracted to receive, and to improve End-User's experience.
- We collect your Personal Information such as your full name, email address, username and password, and company name, to enable you to create an account on the Platform.
- We collect Personal Information, such as your full name, email address, phone number, company name, job title, in order to facilitate your demo request.
- We collect Personal Information, such as your full name, email address, company name, and the content you submitted to facilitate your inquiry when you choose to contact us via the designated form.
- We collect End User Personal Information to provide the Services and Platform to our Customer Users and comply with the contractual obligations we are subject to.
- Such collection of information will enable us to provide you with technical and professional assistance, with regard to the Platform and Services you use or intend to use.

We process the Personal Information where it is necessary for the adequate performance of the contract we have with you or if you are an End-User, you may have with the Customer User.

# 2. Improvement and Development of the Services

- We collect Personal Information to improve and develop our Services and understand feedback on Aliyoop's Platform and Services and to help provide more information on the use of our Services quickly and easily.
- We collect Personal Information for ongoing review and improvement of the information provided on our Platform to ensure it is user friendly.
- We collect Personal Information to improve the management and administration of our business and maintain compliancy with our internal policies and procedures.
- We conduct surveys and research, test features in development, and analyze the information we have to evaluate and improve our Platform and Services, develop new features, and conduct audits and troubleshooting activities.

We process this information in light of our legitimate interest in improving the Platform and Services, to allow our users to have the best experience.

# 3. Maintain a Safe and Secure Environment

We may use your information to detect and prevent fraud, abuse and security incidents in the following ways:

- Verify and authenticate your identity and prevent unauthorized or illegal activity.
- Enhance the safety and security of our Platform and Services.
- Conduct security investigations and risk assessments.
- Prevent or take action against activities that are, or may be, in breach of our terms of service or applicable law.

We process this information in light of our legitimate interest in improving our Platform and Services by enabling our users to browse in a secure environment.

# 4. Personalize Content, Advertising and Marketing

- If you have used Aliyoop Services in the past, we have a legitimate business interest for matching the data we collect with other data we had already collected.
- This enables us to understand your needs and interests, optimize the content we send you and make it more suitable and relevant to your needs.
- This also enables us to improve your experience on the Platform and Services by providing you with personalized content, recommendations, and features.

We process this information in light of our legitimate interest to personalize your experience and customize our content.

# Disclosure of Information and Transfer of Data

We do not disclose any of your Personal Information, to any third party without having received your permission, unless required for the provision of the Services or otherwise

required under law. You can be rest assured that we do not sell your Personal Information to any third parties.

Please note, that in order to perform our contractual and other legal responsibilities or purposes, we may, from time to time, need to share your Personal Information with third parties whose services are required for the provision of our Platform and Services, including but not limited to payment gateways, data management and maintenance service.

We may also transfer your information, including Personal Information, in connection with a corporate merger, consolidation, the sale of related assets or corporate division or other fundamental corporate changes. Furthermore, information about you may also be released in order to comply with any valid legal obligation or inquiry or process such as a search warrant, subpoena, statute or court order. We will also release specific information in special cases, such as if you use the Platform or the Services to perform an unlawful act or omission or take any act or omission that may damage Aliyoop, its property and goodwill, or if there is an attempted breach of the security of the Platform or Services or a physical or property threat to you or others. In case you feel that any of your rights have been compromised, you have the right to file a complaint to the relevant supervisory authority.

# Your Rights

You have the right at any time to request to access or delete your information. To exercise these options, please contact us at support@aliyoop.com.

In some jurisdictions, in particular those located within the European Union (the "EU") or within the European Economic Area (the "EEA"), you may be afforded specific rights regarding your Personal Information. Subject to such eligibility, you may have the following rights to:

- 1. Request a rectification of your Personal Information where the information we hold about you is incorrect or incomplete.
- 2. Object to the processing of your Personal Information for direct marketing purposes.
- 3. Object to the processing of your Personal Information where our legal basis for that processing is that such processing is necessary for our legitimate interests.
- 4. Object to an automated decision-making (including profiling) in certain circumstances.
- 5. Request the erasure of your Personal Information in certain circumstances, such as where processing is no longer necessary for the purpose it was originally collected for, and there is no compelling reason for us to continue to process or store it;
- 6. Receive your Personal Information or ask us to transfer it to another organization that you have provided to us, which we process by automated means, where our processing is either based on your consent or is necessary for the performance of a contract with you.

With regard to information collected on our Services, Aliyoop is a "Data Processor". Therefore, if you are an End-User and wish to exercise the above-mentioned rights, please contact the relevant Customer User, and we will make our best efforts to fulfill your request.

If you wish to file a request regarding any of the above, you may contact us at: support@aliyoop.com.

#### **Cookies**

We may use "cookies" and/or other technologies or files (collectively, "**Cookies**") to identify how visitors make use of our Platform and Services. This aggregated tracking information may be used to help us improve and enhance the Platform and Services experience for all of our users. In addition, Cookies are used for adjusting the Platform and Services to your personal preferences. Cookies contain information such as the pages you visited, the length of time you stayed on the Platform and Services, the location from which you accessed the Platform and Services and more. If you would prefer not to have Cookies stored on your computer, you may modify your browser settings to reject most Cookies, or manually remove Cookies that have been placed on your computer. However, by rejecting the Cookies, you may be unable to fully access the offerings on our Platform and Services. To find out more about Cookies, visit <u>www.allaboutcookies.org</u>.

#### Opt In or Opt Out

You are always in control of your data, and if you choose to receive information from us, or others, you can change your mind later. If, at any time, you would like to stop receiving such information or opt out of a feature, you may notify us by writing to support@aliyoop.com. You should be aware, however, that it is not always possible to completely remove or modify information in our databases and servers, although we will always make reasonable efforts to do so upon your request.

#### Links to Other Websites

This Platform may provide links to other websites. Please be aware that these other websites are not covered by our Privacy Policy. This Privacy Policy does not cover the information practices exercised by other providers of products or services, advertisers or other websites, companies or individuals, which are not owned or controlled by Aliyoop. We suggest that when linking to another website, you always read that website's privacy policy before volunteering any personally identifiable information.

#### **Data Security**

We deploy industry standard measures to ensure the security, confidentiality, integrity and availability of the Personal Information we process. We maintain physical, technical and administrative safeguards, and test and update these periodically. We endeavor to restrict access to Personal Information on a 'need to know' basis for the provision of the Platform and Services to you. No such measures are perfect or impenetrable. In the event of a security breach, we will take all reasonable action to minimize any harm. Although we will do our best to protect Personal Information, we cannot guarantee the security of data transmitted to our Platform and transmission is at the users own risk.

#### Data Retention

Generally, Aliyoop does not retain information longer than necessary to provide its Services and for its reasonable business and lawful needs. If you withdraw your consent to us processing your Personal Information, we will erase your Personal Information from our systems, unless the Personal Information is required for Aliyoop to establish, exercise or defend against legal claims or it is necessary for the performance of the Services.

# **California Online Privacy Protection Act**

CalOPPA requires commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require any person or company in the United States (and conceivably the world) that operates websites collecting Personally Identifiable Information from California consumers, to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals or companies with whom it is being shared. See more at: http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dp uf.

# According to CalOPPA, we agree to the following:

- Once this Privacy Policy is created, we will add a link to it on the first significant page after entering our Platform.
- Our Privacy Policy link includes the word 'Privacy' and can easily be found on the Platform.
- You can request to change your Personal Information by emailing us.

# California Privacy Rights

The California Consumer Privacy Act of 2018 ("**CCPA**") permits users who are California residents to request to exercise certain rights. If you are a California resident, the CCPA grants you the right to request certain information about our practices with respect to your Personal Information. In particular, you can request to receive information on the following:

- The categories and specific pieces of your Personal Information that we have collected.
- The categories of sources from which we collected your Personal Information.
- The business or commercial purposes for which we collected your Personal Information.
- The categories of third parties with which we shared your Personal Information.

You can be rest assured that we do not sell your Personal Information. If you choose to exercise your rights, we will not charge you different prices or provide different quality of our Services, unless those differences are related to your provision of your Personal Information.

Please note that you must verify your identity and request before further action is taken. As a part of this process, government identification may be required. Moreover, you may designate an authorized agent to make a request on your behalf.

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. Any disclosures we provide, will only cover the 12 month period preceding your verifiable request's receipt. If, for some reason, we cannot reply within such time frame, our response will include an explanation for our inability to comply. If you wish to exercise your CCPA rights, please contact us at: support@aliyoop.com.

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- 1. Deny you goods or services.
- 2. Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- 3. Provide you with a different level or quality of goods or services.
- 4. Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

# CAN SPAM Act

The CAN-SPAM Act is a Federal US law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

To be in accordance with CAN SPAM, we agree to the following:

- •\_\_\_Not use false or misleading subjects or email addresses.
- •\_\_\_Identify the commercial message sent to you as an advertisement when required.
- •\_\_\_Include the physical address of our business or site headquarters.
- •\_\_\_Monitor third-party email marketing services for compliance, if one is used.
- Honor opt-out/unsubscribe requests quickly.
- •\_\_\_\_Allow users to unsubscribe by using the link at the bottom of each email.

If at any time you would like to unsubscribe from receiving future emails, you can email us at support@aliyoop.com and we will promptly remove you from ALL correspondence.

# **Children's Privacy**

The Platform is not intended for children under the age of 16. We do not, knowingly or intentionally, collect information about children who are under 16 years of age.

# IF YOU ARE UNDER THE AGE OF 16 YOU MAY NOT USE THE PLATFORM AND SERVICE, UNLESS PARENTAL CONSENT IS PROVIDED.

If you believe that we may have any Personal Information from or about a person under the age of 16, please contact support@aliyoop.com.

# **Questions Regarding Our Privacy Policy**

If you have any questions regarding this Privacy Policy or the practices described above, you are always welcome to contact us at support@aliyoop.com.

# **Revisions and Modifications to our Privacy Policy**

We reserve the right to revise, amend, or modify this Privacy Policy at any time. When changing the policy, we will update this posting accordingly. Please review this Privacy Policy often so that you will remain updated regarding our current policies.

# **Governing Law and Jurisdiction**

This Privacy Policy will be governed and interpreted pursuant to the laws of the State of Israel without giving effect to its choice of law rules. You expressly agree that the exclusive

jurisdiction for any claim or action arising out of or relating to this Privacy Policy shall be to the competent courts in Tel Aviv, Israel only, to the exclusion of any other jurisdiction.

This page was updated on March, 2023.