



## **Privacy Notice**

Please read this Privacy Notice and Policy ("**Policy**") carefully. It applies to all information FinSec Innovation Lab LTD (collectively "**Company**", "**we**", or "**us**") collect from you through our website [www.Finseclab.com](http://www.Finseclab.com) ("**Services**").

This Policy outlines the types of Personal Information that we gather about individuals, how we collect and make use of such data, including saving, processing, and sharing the data with third parties (including those located outside the State of Israel), etc.

You are aware that your Personal Information, may be stored on Company's database and you are not under any statutory or contractual obligation to provide us with your Personal Information. If you do not want us to collect, use, or share your information in the ways described in this Policy, you should not access or use the Services. If you do not provide us with your Personal Information as set out in this Policy, we may not be able to offer the Services to you.

By accessing or using the Services, you expressly acknowledge and agree to the terms of this Policy and that we will collect, use, and share your Personal Information with third parties including, third parties located outside the State of Israel, in accordance with the provisions of this Policy.

By using the Services, you further acknowledge and agree that we will process and use your Personal Information in Israel and any other country where we operate. Please be aware that the privacy laws and standards in certain countries may differ from those that apply in the country in which you reside. Please read on to learn more about how we protect Personal Information, including when we transfer Personal Information outside the State of Israel.

### **1. What is Personal Information?**

"Personal Information" means any information that specifically identifies an individual such as a name, address, telephone number, mobile number, or e-mail address, or information about an individual that could be directly linked to such identifying information such as device IP address. Personal Information does not include "Usage Information" (meaning anonymous site usage information such as visit statistics, page views, device type, etc.), unless such information is connected to your Personal Information.

### **2. Information Collected on Our Services**

2.1 Information you provide to us such as first and last name, company name, address, telephone number, mobile number and e-mail address;

2.2 Information collected by automated means on the Services as detailed in the Cookies Policy below.

### **3. How We Use your Personal Information**

When you access or use the Services, we collect, use, share, and otherwise process your Personal Information as described in this Policy. We will use Personal Information and other information we collect through the Services:



- 3.1 to provide the Services and information you request.
- 3.2 to contact you about your use of the Services.
- 3.3 to respond to your emails, questions, comments and complaints.
- 3.4 to improve the Services, and to deliver information about Company's and its affiliates (including any company of Mastercard and Enel X global groups) products and services, promotional and marketing materials, newsletters, updates, advertisements, content, or features that match our users' interests;
- 3.5 to monitor and analyze usage information and otherwise measure the effectiveness of the Services;
- 3.6 to send you updates, security alerts, and support and administrative messages, to detect and prevent fraud, and to otherwise facilitate your use of, and our administration and operation of, the Services.

#### 4. **What Personal Information do we share with third parties?**

We may share your Personal Information with third parties in the following circumstances:

- 4.1 Third Parties Providing Services on Our Behalf. We may share your Personal Information with third parties that perform services on our behalf, such as companies that host or operate our Services; provide IT service, legal advisers, accountants, data analysis, marketing services, social media services, etc.
- 4.2 We may share your Personal Data with our affiliates including any company of Mastercard and Enel X global groups, for purposes identified in this Privacy Notice.

#### 4.3 Legal Disclosure

We may transfer and disclose information, including your Personal Information, to third parties to comply with any legal obligation; at the request of governmental authorities conducting an investigation or otherwise requiring disclosure (including without limitation to meet law enforcement requirements and for the purposes of national security); to verify or enforce our Terms of Service; or to otherwise protect the rights, property, safety, or security of us, the public and/or other users and visitors of our Services.

#### 4.4 Business Transfers

We may also share your Personal Information with our affiliates and shareholders, and such entities may use your information in accordance with this Privacy Policy. As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or all or a portion of our assets, Personal Information and any other information that we have collected through the Services may be disclosed to such entity as part of the due diligence process, and will be transferred to such entity as one of the transferred assets. Also, if any bankruptcy or



reorganization proceeding is brought by or against us, all such information may be considered an asset of ours, and as such, may be sold or transferred to third parties.

## 5. **Cookie Policy**

5.1 Our Services use cookies and other similar technologies like pixel tags and web beacons. A cookie is a small piece of data that a website asks your browser to store on your computer or mobile device. Cookies allow Services to "remember" your actions or preferences over time. When you visit our Services, the cookies may store or retrieve information on your browser, which may be about you, your preferences and/or your device.

5.2 We use cookies, as well as third party cookies, to operate and improve the Services, measure our audience, enhance your experience and provide you with content and advertising tailored to your interests based on your browsing activities and actions on this and other sites. For instance, cookies enable us to assess how many users access or use our Services, which content, products, and features of our service most interest our users, what types of content our users like to see, and how our Services perform from a technical point of view.

5.3 We divide our Cookies into categories depending on their functions and purposes as described in the following:

### **Strictly Necessary Cookies**

These cookies are strictly necessary for the website to work properly and cannot be disabled in our systems. These cookies enable core functionality such as security, network management, and accessibility. Strictly Necessary Cookies are always active.

### **Performance Cookies**

These cookies help improve our Services by collecting information on how you use it. This information enables us to improve site performance, correct any errors and provide you a personalized experience. For instance, it helps us understand how long you spend on different sections of the Services and from where you are accessing it; it also helps us see if you have visited our Services before so that we can not only identify the number of unique visitors but possibly deliver you a personalized experience.

You are not obliged to accept performance cookies and you can modify your browser so that it will not accept Cookies. Most internet browsers allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) to disable existing Cookies; or (iii) to set your browser to automatically reject any Cookies.

Please be aware that certain portions of the Services may not work properly for you, or provide personalized or customized content, if you take these steps.

6. **Retention**

The amount of time we will retain your Personal Information depends on why we collected it and how we use it. We won't retain your Personal Information for longer than we are allowed under applicable law, and otherwise, will not generally retain your Personal Information for longer than is necessary to accomplish our business purposes and protect our legal rights.

7. **Your Rights as Data Subject**

Your rights to review or amend your Personal Information will be in accordance with the Protection of Privacy Law, 5741-1981. If you want to review or amend your Personal Information, please contact us in accordance with the "Contact Us" section below.

8. **Links to Other Sites**

The Service may provide links to other web sites that we do not own or operate. We do not control, recommend, or endorse, and are not responsible for, these websites or their content, products, services, or privacy practices.

9. **How We Protect Personal Information**

We implement reasonable administrative, organizational and technical safeguards and security measures to protect Personal Information. Please keep in mind that no method of transmission over the Internet, or method of electronic storage, is 100% secure. As a result, we cannot promise or guarantee that such information will be immune from any wrongdoing, malfunction, unlawful interception or access, or other kinds of abuse and misuse. Please also note that emails and similar means of communication are not encrypted and we strongly advise you not to communicate any confidential information through such means. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the "Contact Us" section below.

10. **International Operations; Transfers of Information Outside the State of Israel**

The Services are operated in Israel. We store Personal Information about users and visitors to our Services on servers located in the USA. Please be aware that information we collect will be transferred to other countries outside of Israel. By using the Services, providing us with any information, you acknowledge and agree the collection, processing, maintenance, and transfer of such information to third parties outside the State of Israel including to territories in which the privacy laws may not be equivalent to those in the country where you reside and/or are a citizen.

### 11. **Updates to Our Policy**

This Policy may be updated periodically and without prior notice to you, and any changes will be effective immediately upon the posting of the revised Policy through the Services. We will always indicate at the top of this Policy when it was most recently updated. We recommend that you periodically check and review this Policy. Responsibility for being acquainted with the changes, if any, made to and/or by this Policy, rests with you alone.

### 12. **Contact Us**

If you have any concerns or questions about this Policy, about how we process your Personal Information or the way we use cookies, please contact us at [info@finseclab.com](mailto:info@finseclab.com).

### 13. **Governing Laws**

Use of the Services, your interaction with us, and this Policy, is subject to the laws of Israel. The sole jurisdiction for any matter and/or dispute relating to issues of privacy regarding the Services, any content available through the Services and this Policy will be exclusively subject to the jurisdiction of the competent courts in Tel Aviv, Israel.

Last Updated: March 2022