

## **Shekel Scales (2008) Ltd. Privacy Notice**

Updated as of May 2018

Shekel Scales (2008) Ltd. and its subsidiaries, including without limitation Shekel Brainweigh Ltd (together, “**Shekel**” or “**us**”) are committed to your right to privacy.

This Privacy Notice (“**Privacy Notice**”), is an integral part of our Terms of Use, which can be found at: <http://www.shekelbrainweigh.com>, and governs the processing and transfer of Personal Data collected in connection with our website, available at: <http://www.shekelbrainweigh.com> (“**Website**”) or with services otherwise provided by Shekel (collectively, “**Services**”), to each person (the “**User**” or “**you**”) accessing or using the Website and/or the Services.

If you choose to use the Services, interact with the Website, or otherwise provide data to us, you explicitly agree to the use of such data in accordance with this Privacy Notice. You may not use the Services or the Website or submit any data through them if you do not agree to any of the terms hereunder. This Privacy Notice shall not be construed in any manner to derogate from the Terms of Use or any other agreement or understanding between Shekel and you.

Please note, that the Website and/or Services may contain links to other websites, products or services offered by third parties, which are not governed by this Privacy Notice. This Privacy Notice does not apply to the practices of entities which are not controlled by Shekel.

### **THE HIGHLIGHTS:**

- **You are not required by law to provide us with any Personal Data. Sharing Personal Data with us is entirely voluntary.**
- **Our Services are intended for Users over the age of 16 or equivalent minimum age for providing consent to processing of Personal Data in the relevant jurisdiction. Children under such age are not permitted to use the Services. If you are under such age you should cease to use the Services immediately.**
- **You may be entitled under applicable law to request to review, amend, erase or restrict the processing of your Personal Data. Please note that in case you request to erase or restrict the processing of your Personal Data, your use of the Services may be restricted or disabled.**
- **We do not sell, trade, or rent Users' Personal Data to third parties. We only share Personal Data with third parties in connection with the provision of the Services to our Users, or other limited circumstances as specified herein.**
- **If you have any questions or requests regarding the processing of your Personal Data, or would otherwise like to contact us in connection with this Privacy Notice, please send us an email to: [info@shekelonline.com](mailto:info@shekelonline.com).**

#### ***1. What is Personal Data, and what data is collected about me by Shekel?***

“**Personal Data**”, means any information which identifies or can be used to identify a natural person, including, but not limited to, first and last name, phone number, email address, IP address, billing information, etc.

#### **Non-Personal Data**

We collect non-Personal Data regarding Users concerning their use of the Website and Services, such as the scope, frequency, latency, pages accessed, what and when a User views or interacts with content and materials displayed through our Services, device identifiers, and other technical information regarding the device used to access the Services, such as model, operating system, etc.

We also use third-party advertising companies to serve ads when you visit our Website. These companies may use aggregated information (not including your name, address, email address or telephone number) about your visits to this and other Web sites in order to provide advertisements about goods and services of interest to you.

#### Personal Data

- 1.1. If you choose to use the “Contact Us” “Ask a Question” or “Become a Distributor” feature on our Website, you will be requested to provide certain Personal Data, such as full name, company, country, e-mail address, phone number, etc.
- 1.2. When you interact with our Website, Shekel may collect additional information, such as session duration, page impressions, advertisements viewed or clicked on, and Internet protocol (IP) address. Shekel also collects certain data regarding your use of the Website, such as the frequency and the extent of your use.
- 1.3. If you contact us on various customer support issues of other matters, we may also collect data associated with these communications.
- 1.4. We do not knowingly collect or process any Personal Data included in Special Categories of Personal Data (as defined in the GDPR). In the event you become aware that such data has been posted to the Website or collected by us, please inform us immediately.

### **2. *What will Shekel do with my data?***

- 2.1. Non-Personal Data. Non-Personal Data is used mainly for click stream analysis in order to constantly improve and maintain our Website and Services, including among others, in order to measure and understand the level of engagement to our services, for general business analytics and in order to provide a more personalized experience and tailored content, for ensuring the technical functioning of our network, to help prevent fraudulent use of our Services and for developing new services and features.
- 2.2. Personal Data. Personal Data is used only for the following limited purposes:
  - 2.2.1. To provide you with the Services, process transactions, and collect fees.
  - 2.2.2. To resolve any disputes, communicate with you regarding customer service and support issues, and to respond to questions or comments and help resolve any problems.
  - 2.2.3. To prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity thefts and any other misuse of the Website or the Service and to enforce our Terms of Use.
  - 2.2.4. To protect the security or integrity of our databases and the Services, and to take precautions against legal liability.
  - 2.2.5. To improve the Services, and to develop new features, products and services.
  - 2.2.6. To improve your experience on the Website and customize our Services to your interests, including by way of targeted advertising.
  - 2.2.7. For the purposes of our legitimate interests, to the extent not overridden by the rights and freedoms of natural persons, as permitted under applicable law.
  - 2.2.8. To provide updates with respect to material changes to this Privacy Notice or our Terms and Conditions.

### **3. *Does Shekel use cookies?***

Yes, we use data files such as cookies, pixel tags, “Flash cookies,” or other local storage files provided by your browser or associated applications (“**Cookies**”). We use these technologies in order to recognize you as a customer; customize our

Services, content, and advertising; measure promotional effectiveness; help ensure that your account security is not compromised; mitigate risk and prevent fraud; and to promote trust and safety across our sites and Shekel Services.

Cookies can be placed on your device by the website operator such as Shekel, when you visit our website, such Cookies constitute – “**first party**” Cookies, or by a party other than Shekel, in which case the Cookies will constitute – “**third party**” Cookies.

Cookies can be differentiated by their time of use:

“**Session Cookies**” are Cookies that exists between the time you visit a website and the time you ended the particular browsing session. Session Cookies expire and are automatically deleted when you close your internet browser.

“**Persistent Cookies**” are Cookies that stay on your device – they do not expire and are not automatically deleted when you close your browser. The length of time Persistent Cookies stay on your device varies from Cookie to Cookie. We and third parties use Persistent Cookies for a variety of purposes, such as to store your preferences so that they are available for the next visit, to keep a more accurate account of how often you visit our websites and applications, how often you return, how your use of our websites and applications may vary over time, and the effectiveness of advertising efforts.

You may at any time program your browser to block cookies, but please be aware that such blocking may prevent us from providing some or all of the Services to you. These cookies help us track how visitors use the Website and our Services.

If you wish not to receive Cookies from us, with the exception of technical Cookies, you may notify us by following the instructions for opting out of such Cookies on our websites and applications or sending us an email to: info@shekelonline.com. If you are accessing our website from the EEA, we will not use third party Cookies and persistent Cookies without your prior consent.

If you have any questions about how we use Cookies not answered in this statement, you may contact us by sending us an email to: info@shekelonline.com.

#### ***4. How Can I Control My Personal Data?***

- 4.1. **Reviewing and amending your Personal Data.** You may send us a request in connection with reviewing your Personal Data to: info@shekelonline.com. In the event any Personal Data is incorrect or outdated, you may update and correct such data by providing us with appropriate notification or correcting the data directly on the Website, as applicable to you.
- 4.2. **Right of erasure and restriction.** You may also be entitled request the erasure or the restriction of your Personal Data, and we will comply with such requests, to the extent required under applicable law.
- 4.3. **Portability of Personal Data.** To the extent relevant to you and to the Services, you may be entitled to request the portability of your Personal Data, and we will comply with such requests, to the extent required under applicable law.
- 4.4. **Retention of Data.** We reserve the right to retain any Personal Data for as long as reasonably necessary in order to: (i) fulfill the purposes described herein; (ii) in the defense or assertion of legal claims and liability; (iii) for the analysis and development of the Services; and (iv) to comply with applicable law. Non-Personal Data and statistical anonymized data may be retained by us without limitation.

#### ***5. Will Shekel Share My Personal Data With Others?***

**WE DO NOT SELL OR RENT ANY OF YOUR PERSONAL DATA TO NON-AFFILIATED THIRD PARTIES FOR THEIR MARKETING PURPOSES.**

5.1. Non-Personal Data, aggregate and statistical or otherwise anonymized data may be shared without limitation with third parties at our discretion. This information does not contain Personal Data and is used to develop content and services for our Users and clients.

5.2. We share Personal Data only under the following limited circumstances:

5.2.1. With trusted partners and third parties who assist us in operating the Services and conducting our business, such as fraud prevention, bill collection, marketing and technology services.

5.2.2. For personalizing your experience of the Services.

5.2.3. As necessary to help detect and prevent potentially illegal acts and fraud, and to guide decisions about products, services and communications.

5.2.4. With our affiliates and connected companies, such as subsidiaries, sister-companies and parent companies.

5.2.5. To comply with a legal requirement, for the administration of justice, to protect your vital interests or the vital interests of others, to protect the security or integrity of our databases or the Services, to take precautions against legal liability, or in the event of a corporate sale, merger, reorganization, dissolution or similar event.

5.2.6. Other third parties with your consent or direction to do so.

**6. *What is the lawful basis under which Shekel processes Personal Data?***

6.1. Certain processing activities conducted by us are based on the necessity of such activities for the performance of our Services and the contract between us and our Users and customers.

6.2. Other processing activities are based on the grounds that they are necessary for the purposes of our legitimate interests or the legitimate interests of a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of natural persons which require protection of Personal Data.

6.3. There may be certain processing activities based on your consent. In connection with such activities, you may rescind your consent, by sending us an email to: [info@shekelonline.com](mailto:info@shekelonline.com). Please note that in the event you rescind your consent to the processing of Personal Data, we may not be able to provide you with some or all of the Services.

**7. *Will Shekel transfer my Personal Data internationally?***

Our databases are currently located in Israel. Some of our processing activities are made in Israel. The European Commission has decided that the State of Israel ensures an adequate level of privacy and data protection, therefore, in accordance with the GDPR, the transfer of Personal Data from the EU to Israel is lawful and does not require any specific authorization.

Any other transfer of Personal Data originating from the EU to a third country (other than Israel) shall be made in accordance with applicable law, including by providing adequate protections, or otherwise implementing appropriate safeguards to ensure the protection of our Users' rights.

**8. *Will I receive promotional materials from Shekel?***

Shekel may send you offers that may be of special interest to you via email or SMS. You may unsubscribe from receiving such communications at any time, by sending us a notification to: [info@shekelonline.com](mailto:info@shekelonline.com), or following the instructions for unsubscribing included in such communications.

**9. *Persons under 16***

Our Website is a general audience Website, which is not directed to persons under 16 years old. If a parent or guardian becomes aware that his/her child has provided us with Personal Data without their consent, he/she should contact us

immediately. We do not knowingly collect or solicit Personal Data from people under 16 years old. If we become aware that a person under 16 years old has provided us with Personal Data, we will delete such data from our databases.

**10. *Applicable Laws***

The provisions included in this Notice relating to matters regulated under the GDPR will apply only to the processing of Personal Data which is subject to the GDPR in accordance with the applicability provisions contained therein. If the GDPR does not apply to the processing of your Personal Data, some of the provisions above may not apply to you.

**11. *Questions or concerns regarding privacy***

If you have any questions or concerns regarding privacy issues, please send us a detailed message to [info@shekelonline.com](mailto:info@shekelonline.com) and we will make every effort to resolve your concerns without delay.

Shekel may, at any time and from time to time, modify this Privacy Notice. Modifications to this Privacy Notice will be posted on the Website, and shall be effective as of the date in which they are posted on the Website.

You are also entitled to file a complaint with the appropriate supervisory authority in connection with concerns you may have with regards to your privacy and Personal Data.

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