

Privacy Policy

Last updated: June 1st, 2021

INTRODUCTION

Sanoculis LTD. ("we", "our", "us") are committed to protecting and respecting your privacy. We are a company established in Israel with a registered office at 10 Landau, Kiryat Ono, 5555110, Israel, and for the purpose of the General Data Protection Regulation (the "GDPR"), we are the data controller.

This policy sets out the basis on which we will process any personal data or usage information we collect from you, or that you provide to us, in connection with your use of our website (the "Website"). Please read this policy carefully so that you understand your rights in relation to your personal data, and how we will collect, use and process your personal data. If you do not agree with this Privacy Policy in general or any part of it, you should not access the Website.

WHAT TYPES OF INFORMATION DO WE COLLECT AND HOW DO WE USE IT?

Information you give us. You may provide information by contacting us via our Website or email, telephone, instant chat, social media or otherwise, or by signing up for our newsletters or alerts.

INFORMATION PROVIDED BY B2B CUSTOMERS

During the course of your organization's relationship with us, and in the context of us providing your organization with our products and/or services, we collect personal data such as your name, job title, organization, business postal address, business telephone number, business fax number, business e-mail address, and contact and building information. Through your in-person communications and/or online interactions with us, we will ask you to provide information regarding your professional interests, demographics, experience with our technology and/or services and contact preferences. We will combine the information you provide to us through different communications and contact channels, such as combining data collected online with information provided offline.

As it is in our legitimate interests to be responsive to you and to ensure the proper functioning of our products and organization, we will use information: which you give to us to: communicate with you; sign you up for our newsletters or alerts; contact you via telephone or email; identify our users; administer and provide services and customer support per your request; enforce our Website terms and conditions; if you have opted in to marketing, communicate with you about products, services, promotions, events and other news and information we think will be of interest to you; and/or provide third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information); and which you give to us when you interact with us in your capacity as a representative or employee of an organization which is a supplier or customer of ours or a consultant we have engaged: to manage our relationship with your organization, including providing quotes, proposals, demonstrations and generating contracts; to provide customer services to your organization, including set-up and installation of products, processing and investigating complaints, providing services, support, training and certification; to conduct research and development, provide quality assurance and product validation; to comply with our regulatory requirements for compliance purposes; to improve our technology and services; to facilitate our customer events; to provide a mailing list in order to facilitate a forum to discuss our technology; and/or to provide marketing communications to your organization, improve our brand management and conduct market research.

TECHNICAL USAGE INFORMATION

When you visit the Website, we automatically collect the information sent to us by your computer, mobile phone, or other access device. This information includes: your IP address; device information including, but not limited to, identifier, name, and type of operating system; mobile network information; and standard web information, such as your browser type and the pages you access on our Website.

As it is in our legitimate interests to process your data to provide effective services and useful content to you we collect this information in order to: personalize our Website to ensure content from the Website is presented in the most effective manner for you and your device; monitor and analyze trends, usage and activity in connection with our Website and services to improve the Website; administer the Website, and for internal operations, in order to conduct troubleshooting, data analysis, testing, research, statistical and survey analysis; keep the Website safe and secure; or measure and understand the effectiveness of the content we serve to you and others.

DO WE USE COOKIES?

We use cookies to collect information about your browsing activities over time and across different websites following your use of our services. They allow us to recognize and count the number of users and to see how users move around the Website when they are using it. This helps us to improve the services we provide to you and the way the Website works. You can find more information about cookies and how to manage them at <http://www.allaboutcookies.org/>. [For more information about cookies, please refer to our Cookies Policy.]

We use Google Analytics, which is a web analytics tool that helps us understand how users engage with the Website. Like many services, Google Analytics uses first-party cookies to track user interactions, as in our case, where they are used to collect information about how users use our site. This information is used to compile reports and to help us improve our Website. The reports disclose website trends without identifying individual visitors. You can opt out of Google Analytics without affecting how you visit our site – for more information on opting out of being tracked by Google Analytics across all websites you use, visit this Google page: <https://tools.google.com/dlpage/gaoptout>.

B2B MARKETING COMMUNICATIONS

To the extent permitted by applicable laws, we may send your organization periodic marketing messages, including newsletters, promotions and special offers. We will use your name, business postal address, business telephone number, business fax number and business email address to send these messages to your organization. You are able to opt out of personally receiving such messages without any negative effect to your relationship with us by following the unsubscribe instructions included in each marketing email. However, please note that opting out may prevent your organization from receiving email messages regarding updates, improvements, or special offers. If you opt out of such marketing messages, we will continue to send you non marketing emails, e.g. emails about our business dealings with your organization. We also reserve the right to contact you when we believe it necessary, including where required by law.

We will also provide you the opportunity to let us know if you wish to opt out at any time from other contacts from us and without any negative effect to your relationship with us, and we will do everything we can to honor such requests. This choice will be offered at the bottom of our online or offline communications to you as well as on our web pages.

HOW DO WE SHARE YOUR PERSONAL DATA?

We do not sell, rent or lease your personal information to others except as described in this Privacy Policy. We share your information with selected recipients. These categories of recipients include: Cloud storage providers located in Israel to store the personal data you provide and for disaster recovery services, as well as for the performance of any contract we enter into with you; provided you have consented, advertisers and advertising networks located in Israel and USA that require the data to select and serve relevant adverts to you and others; analytics and search engine providers located in Israel that assist us in the improvement and optimization of the Website. We will share your information with law enforcement agencies, public authorities or other organizations if legally required to do so, or if we have a good faith belief that such use is reasonably necessary to: comply with a legal obligation, process or request; enforce our terms and conditions and other agreements, including investigation of any potential violation thereof; detect, prevent or otherwise address security, fraud or technical issues; or protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law (exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction). We will also disclose your information to third parties: in the event that we sell any business or assets, in which case we will disclose your data to the prospective buyer of such business or assets; or if we or substantially all of our assets are acquired by a third party, in which case information held by us about our users will be one of the transferred assets.

WHERE DO WE STORE YOUR PERSONAL DATA?

The information that we collect from you will be transferred to, and stored at/processed in Israel and in the USA. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this policy. White Listed Countries: Israel, and the US which were found to have an adequate level of protection for personal data by decision of the European Commission. Model Clauses: The personal data that we collect from you will be transferred to, and stored in and processed in the United States, under the Commission's model contracts for the transfer of personal data to third countries.

THE SECURITY OF YOUR PERSONAL DATA

Unfortunately, the transmission of information via the internet or email is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your information transmitted through the Website or over email; any transmission is at your own risk. Once we have received your information, we will take appropriate technical and organizational measures to safeguard your personal data against loss, theft and unauthorized use, access or modification. We will, from time to time, host links to and from the websites of our affiliates or third parties. If you follow a link to any of these websites, these websites will have their own privacy policies and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any information to those websites.

HOW LONG DO WE STORE YOUR PERSONAL DATA?

We will retain your information as follows: if you contact us via email we will keep your data for 7 years thereafter; and data on your use of the Website: thirteen (13) months; and After you have terminated your use of our Website, we will store your information in an aggregated and anonymized format.

YOUR RIGHTS

You have the right to ask us to access the personal data we hold about you and be provided with certain information about how we use your personal data and how we share it with. You also have the right to ask us to correct your personal data where it is inaccurate or incomplete and we will endeavor to do so without undue delay. In certain circumstances, you have the right to ask us to delete the personal data we hold about you: where we are processing your personal data on the basis of legitimate interests and you object to such processing and we cannot demonstrate an overriding legitimate ground for the processing; where you have provided your personal data to us with your consent and you wish to withdraw your consent and there is no other ground under which we can process your personal data; or where you believe the personal data we hold about you is being unlawfully processed by us. In certain circumstances, you have the right to ask us to restrict (stop any active) processing of your personal data: where you believe the personal data we hold about you is inaccurate and while we verify accuracy; where we want to erase your personal data as the processing is unlawful but you want us to continue to store it; where we no longer need your personal data for the purposes of our processing but you require us to retain the data for the establishment, exercise or defense of legal claims; or where you have objected to us processing your personal data based on our legitimate interests and we are considering your objection. In addition, you can object to our processing of your personal data based on our legitimate interests and we will no longer process your personal data unless we can demonstrate an overriding legitimate ground. To exercise any of these rights above, please contact us at info@sanoculis.com. In addition, you have the right to complain to any applicable data protection supervisory authority.

Please note that these rights are limited, for example, where fulfilling your request would adversely affect other individuals or Company trade secrets or intellectual property, where there are overriding public interest reasons or where we are required by law to retain your personal data.

WITHDRAWAL OF CONSENT

Where you have provided your consent for us to process your personal data, you can withdraw your consent at any time by sending us email at info@sanoculis.com.

OBJECTION TO MARKETING

At any time you have the right to object to our processing of data about you in order to send you marketing materials, including where we build profiles for such purposes, and we will stop processing the data for that purpose.

COMPLAINTS

In the event that you wish to make a complaint about how we process your personal data, please contact us in the first instance at info@sanoculis.com and we will endeavor to deal with your request as soon as possible. This is without prejudice to your right to launch a claim with the data protection supervisory authority in the EU country in which you live or work where you think we have infringed data protection laws.

CHANGES

Any changes we will make to this policy in the future will be posted on this page. Please check back frequently to see any updates or changes to this policy.

CONTACT

Questions, comments and requests regarding this policy are welcomed and should be addressed to info@sanoculis.com.

Thank you for reading our Privacy Policy.