

## **SMARTLATION LTD. - PRIVACY POLICY**

Smartlacion Ltd. ("**Smartlacion**") is committed to protecting your privacy and your personally identifiable information ("**Personal Information**").

Smartlacion has created this privacy policy ("**Privacy Policy**") to let you know what information Smartlacion (or others on its behalf) collect from you when you use of Smartlacion platform ("**Platform**") and the services contained and provided through the Platform ("**Services**"), how is this information collected and how is it used.

This Privacy Policy is part of and should be read in conjunction with the Terms and Conditions. When you access or use Smartlacion's website, the Platform, utilize or provide Services through the Platform, you agree that Smartlacion (or others on its behalf) may collect, use and disclose your information (including Personal Information) in accordance with the terms of this Privacy Policy.

### **COLLECTION OF INFORMATION**

Smartlacion (or others on its behalf) collects and stores the Personal Information from you, including without limitation, your name, home or other physical address, email address, phone number, other contact information, domain names and other information relating to your website and you webpage. Smartlacion also collects and stores an activity log unique to you that collects certain administrative and traffic information including without limitation source IP address, time of access, date of access, web page(s) visited, language use, Platform crash reports, type of browser used, the technical operation of the Platform, and any information required to ensure your use of the Platform is compliant with the Terms and Conditions. Smartlacion collects and stores the aforesaid information when you visit its website; use the Platform, receive or provide Services through the Platform and also in your communications with Smartlacion.

You are responsible for ensuring the accuracy of your Personal Information and all other information you submit to Smartlacion (or to others on its behalf). Inaccurate information will affect the information you receive when using Smartlacion's website, the Platform and Smartlacion's ability to contact you as contemplated in this Privacy Policy as well as to provide you with the Platform content in the best manner possible.

### **USE OF INFORMATION**

Smartlacion uses the Personal Information and other information it (or others on its behalf) collect from or about you to make the Platform available for you, to provide translation services using Services Providers, to conduct statistical analysis, to provide customer support, to undertake necessary security and identify verification checks, to process any of your online transactions, meet certain business requirements and for any other purpose related, directly or indirectly, to the operation of the Platform. Smartlacion may disclose your Personal Information (and any other information) to any third parties that provide services to Smartlacion in order to allow enable or improve the provision of the Services to you. Your Personal Information may also be used by Smartlacion to provide you with promotional offers and information regarding Smartlacion's as well as products and services from third parties carefully selected by us and in order for Smartlacion to improve the Platform, the customer services and services provided through the Platform. Smartlacion may also use the aforesaid

information to track your use of Smartlotion's website and the Platform and/or for other internal purposes, such as evaluating, providing, and improving the website and the Platform.

Smartlotion may disclose your Personal Information to associated entities and/or to third parties, at Smartlotion's sole discretion, where the purpose of such disclosure is to provide you with the Services. In addition, Smartlotion may disclose your Personal Information and other information collected, if required to do so by law, or if Smartlotion believes in good faith that such action is necessary to comply with applicable legislation, a current judicial proceeding, a court order or legal process, or to protect and defend Smartlotion's rights or property, the personal safety of other users of the Platform or the public at large. Smartlotion reserves the right to share the aforesaid information with appropriate authorities and financial institutions, if Smartlotion determines in its sole discretion that you are attempted to defraud Smartlotion or if Smartlotion suspects you are committing any fraudulent activity or any other prohibited transaction or any criminal activity or if you publish hate speech on your website or if you breach the Terms and Conditions.

### **CHOICE / OPT-OUT**

By agreeing to this Privacy Policy, you hereby allow Smartlotion to provide you with communications from Smartlotion itself, as well as from third parties, either in connection with the Platform or the Services or in connection with other (including, but not limited to, commercial matters and offers). You hereby acknowledge and consent to the sending of such communications, and will not argue that such activity amounts to sending of unsolicited communications. You also hereby acknowledge that Smartlotion are not responsible for the communication sent to you by third parties, their content and method of distribution.

You may opt-out from receiving communications from Smartlotion by sending a blank e-mail to us with the word "Remove" to [ENTER **EMAIL ADDRESS**] and/or by clicking the unsubscribe link on our e-mails sent to you.

### **COOKIES**

Smartlotion uses a browser feature known as cookies, which are small text files which are placed on your computer or equipment when you visit certain online pages, to track your activities, record your preferences, and make our site and the Platform more responsive to your needs by delivering a better and more personalized experience to you.

### **SECURITY**

Smartlotion has implemented suitable security policies, rules and technical measures to protect and safeguard the Personal Information under its control from unauthorized access, improper use or disclosure, unauthorized modification, unlawful destruction or accidental loss. All of Smartlotion's employees and data processors that have access to, and are associated with the processing of your Personal Information, are obliged to respect the confidentiality of your Personal Information.

### **LINKS TO OTHER SITES**

The Platform and Smartlotion's website may contain links to other sites. Other sites

may also reference or link to the Platform. Smartlotion is not responsible for the privacy practices or the content of such other online websites, and any information collected by these third party online sites is not governed by this Privacy Policy, and Smartlotion assumes no responsibility or liability whatsoever for the policies (including privacy policies), practices, actions or omissions of such third parties.

### **TRANSFER**

In the event that Smartlotion sells, assigns or transfers some or all of its business or assets to a successor or acquirer, or if Smartlotion is acquired by or merge with a third party, or if Smartlotion files for bankruptcy or becomes insolvent, Smartlotion may sell, assign or transfer all of your Personal Information and other information provided by you or about you, regardless of your opt status, to such successor or acquirer.

### **DISCLAIMER**

The Platform operate "AS-IS" and "AS-AVAILABLE", without liability of any kind. Smartlotion is not responsible for events beyond its direct control. Smartlotion cannot guarantee nor do it represent that there will be error-free performance regarding the privacy of your Personal Information, and Smartlotion will not be liable for any indirect, incidental, consequential or punitive damages relating to the use or release of Personal Information.

### **YOUR ACCEPTANCE OF THIS POLICY**

By agreeing to the Terms and Conditions during the registration process on Smartlotion's website, or by using or browsing the Platform, you agree to be bound by this Privacy Policy, and to any changes Smartlotion may make to this Privacy Policy from time to time – without the need to notify you about such changes. It is recommended that you revisit this Privacy Policy regularly so as to be kept apprised of the updated Privacy Policy. Your continued use of the Platform and/or receipt of Services following changes to this Privacy Policy mean you accept these changes.

### **COOKIES POLICY**

Cookies and Other Tracking Technologies. Our Site may utilize “cookies”, anonymous identifiers and other tracking technologies in order to for us to provide our Site and present you with information that is customized for you. A “cookie” is a small text file that may be used, for example, to collect information about activity on the Site. Certain cookies and other technologies may serve to recall Personal Information, such as an IP address, previously indicated by a user. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser.