

WEBSITE PRIVACY POLICY

[Last Modified: March 21, 2024]

This Privacy Policy (“**Privacy Policy**”) governs the processing and transfer of personal data collected or processed by FinSec Innovation Lab LTD. (Collectively with its affiliates and subsidiaries shall be referred to as “**Company**”, “**we**”, “**us**” or “**our**”) when you access or use any of our websites and landing pages, including <https://www.finseclab.io/> (“**you**” or “**your**” and “**website**”).

This Privacy Policy explains what data we may collect from you, how such data may be used or shared with others, how we safeguard it and how you may exercise your rights related to your Personal Data (as defined below), as required under relevant privacy regulation, including the Israeli Privacy Protection Law, 1981, and where applicable the EU General Data Protection Regulation (“**GDPR**”).

If you have any questions regarding this Privacy Policy or our data practices, you are welcome to contact us at: info@finseclab.com.

You are not required by law to provide us with any Personal Data. However, please note that some of our services and website features require the processing of certain Personal Data and without such data we may not be able to provide you with all or part of such services and features.

A. POLICY AMENDMENTS:

We reserve the right to amend this Policy from time to time, at our sole discretion. The most recent version of the Policy will always be posted on the website. The updated date of the Policy will be reflected in the “Last Modified” heading. Any amendments to the Policy will become effective immediately, unless we notify you otherwise. If we materially change the way in which we process your previously collected personal data, we will provide you with prior notice, or where legally required, request your consent prior to implementing such changes. We strongly encourage you to review this Policy periodically to ensure that you understand our most updated privacy practices.

B. CONTACT INFORMATION AND DATA CONTROLLER INFORMATION:

FinSec Innovation Lab LTD. is the Data Owner or Data Controller (as such terms are defined under applicable privacy legislation) of Personal Data collected from you as a visitor or user of our website.

You may contact us as follows:

- **By email:** info@finseclab.com
- **By Phone:** +972 8 6756166
- **By Mail:**

FinSec Lab Ltd.

Torat Hayahsut 11

Be'er Sheva

C. DATA SETS WE COLLECT AND FOR WHAT PURPOSE:

Below you can find information regarding the purposes for which we process your personal data as well as our lawful basis for processing, the definition of “personal” and “non-personal” data, and how it is technically processed.

Non-Personal Data

During your interaction with the Website, we may collect aggregated, non-personal non-identifiable information (“**Non-Personal Data**”). We are not aware of the identity of the user from which the Non-Personal Data is collected. We collect Non-Personal Data regarding your use of the website, such as the scope, frequency, latency, pages accessed and viewed, time and date stamp, interactions with content and materials displayed through our website, language preference, and other technical information regarding the device used to access the website (e.g., type of device, type of browser, operating system), etc. Non-Personal Data may be used by us without limitation and for any purpose.

We may sometimes process and anonymize or aggregate Personal Data and identifiable information in a manner that shall create a new set of data that will be Non-Personal Data. Such a new data set can no longer be associated with any identified natural person.

If we combine Personal Data with Non-Personal Data, the combined information will be treated as Personal Data or for as long as it remains combined.

Personal Data

We may also collect from you, directly or indirectly, during your access or interaction with the website, individually identifiable information, namely information that identifies an individual or may, with reasonable effort, be used to identify an individual (“**Personal Data**”). The types of Personal Data that we collect as well as the purpose for processing and the lawfulness are specified in the table below.

On our website, we do not knowingly collect or process any Personal Data of sensitive nature, such as data constituting or revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning a person's health or data concerning a person's sex life or sexual orientation.

The table below details the processing of **Personal Data**, the purpose, lawful basis, and processing operations:

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS PER GDPR (where applicable)
<p>Contact Information: If you voluntarily contact us, e.g., through a “contact us” form in our website or by mail, you may be required to provide us with certain personal data such as your name, job title, company name, email address, and any additional information you decide to share with us.</p> <p>** additional information which is not personal in nature, such as description of company or business</p>	<p>We will use this data to respond to your inquiry.</p> <p>The correspondence with you may be processed and stored by us in order to improve our internal operations, as well as in the event we reasonably determine it is needed for future assistance or to handle any dispute you might have with us.</p>	<p>We process such Contact Information subject to our legitimate interest.</p>

<p>and other business-related data may be required.</p>	<p>We may retain and manage such information using external services and platforms such as CRM systems.</p>	
<p><u>Newsletter & Updates Registration:</u></p> <p>In the event you sign up to receive our newsletter or other promotional materials, by directly signing up or through ticking a relevant checkbox, you will be requested to provide your contact details, such as email address.</p>	<p>We will use the information you provide in order to include you in our mailing list and send you the materials you have signed up to receive.</p>	<p>Our lawful basis for the processing of this data is your consent.</p> <p>You may withdraw your consent at any time by clicking the “unsubscribe” link which will be included in the email we will send you. You may also contact us through the above means of contact and request to unsubscribe.</p>
<p><u>Applying for any of our Programs:</u></p> <p>if you wish to apply to any of our accelerators or other similar programs, you may do so through a designated online form available on our website. As part of that you may be required to provide certain information including contact info, details about your venture or company, and other details pertaining to your business as requested through such form.</p>	<p>We will collect such data, analyze it, and use such data for our screening process, to check your suitability for the submitted program. We may keep such data, whether your submission has been approved or not, for future evaluation, improvement, development of our business and record keeping.</p>	<p>Our lawful basis for processing this data is the contemplated contract between us. Any further use and record keeping shall be per our legitimate interest.</p>
<p><u>Online Identifiers and Advertising and Targeting data:</u></p> <p>When you interact with the website, we may collect online identifiers such as your Internet Protocol address (IP), Cookie-ID, etc., and other information that relates to your activity through the website, such as pages viewed, click stream data, login time and date stamp, etc. This data might be collected directly by us or by through our use of third parties' cookies and advertisement platforms.</p>	<p>Collection of device identifiers is needed for the following purposes:</p> <p>(i) Internal statistics and analysis, for which device identifiers might be combined with usage data, for example, to analyze how many visitors have accessed certain content and from which country (where the country is extracted from the IP address) in order to enhance and improve our website and its content;</p> <p>(iii) Marketing and advertising purposes. Our partners will process this data to manage and deliver advertisements and content more</p>	<p>Our lawful basis for processing this data for technical and security purposes is based upon our legitimate interests.</p> <p>If we will process your Personal Data for analytics and advertising purposes and to the extent required under applicable laws (e.g., if we use third party cookies), we will obtain your consent for such processing. In any such case, you may withdraw consent or change your preferences at any time by using the cookie</p>

<p>Similarly, we may collect Ad calls, which is a code shared with advertisers, include zip code, advertiser ID, the webpage the end user came from, the IP address, approximate location which assists the advertiser to determine which ads to place. The ad call will also include the end user’s preference regarding interest-based advertisement as further explained herein.</p>	<p>effectively and personally, including contextual, behavioral and interests-based advertising based on your activity, preferences or other data available to us or to our business partners and advertisers, including for re-targeting purposes.</p>	<p>settings tool available on our website.</p>
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Please note that the actual **processing operation** per each purpose of use and lawful basis detailed in the table above may differ. Such processing operation usually includes a set of operations made by automated means, such as collection, storage, use, disclosure by transmission, erasure, or destruction. The transfer of personal data to third-party countries, as further detailed in the Data Transfer Section, is based on the same lawful basis as stipulated in the table above.

In addition, we may use certain Personal Data to prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity thefts, and any other misuse of the website and to enforce the Terms, as well as to protect the security or integrity of our databases and the website, and to take precautions against legal liability. Such processing is based on our legitimate interests.

D. HOW WE COLLECT YOUR INFORMATION:

Depending on the nature of your interaction with us, we may collect the above detailed information from you, as follows:

- **Automatically** – we may use cookies (as elaborated in the section below) or similar tracking technologies (such as pixels, tags, agent, etc.) to gather some information automatically.
- **Provided by you or about you voluntarily** – we will collect information if and when you choose to provide us with the information, such as contact us form, application form, etc. all as detailed in this Privacy Policy.
- **Provided from third parties** – where permitted under applicable law and provided with your consent for cookie usage, we may enrich the Personal Data collected about you with data provided by third parties.

E. COOKIES

When you access or use the website, we use “cookies” or similar tracking technologies, which store certain information on your device (i.e., locally stored). The use of cookies is a standard industry-wide practice. A “cookie” is a small piece of information that a website assigns and stores on your computer while you are viewing a website. Cookies are used by us for various purposes, including allowing you

to navigate between pages efficiently, as well as for statistical purposes, analytic purposes and advertising. You can find more information about our use of cookies here: www.allaboutcookies.org.

There are several types of cookies, including without limitation:

- **Essential, Functionality, Operation & Security Cookies.** *These cookies are essential for enabling Visitor movement around the website, for the website to function properly, and for security purposes (i.e., used to authenticate Visitors, prevent fraudulent use, and protect Visitor data from unauthorized parties). This category of cookies either cannot be disabled, or if disabled, certain features of the website may not work.*
- **Analytic, Measurement & Performance Cookies.** *These cookies are used to collect information about how Visitors use our website, in order to improve our website, content, and the way we offer them, as well as assess performance of the content and marketing campaigns. These cookies enable us, for example, to assess the number of Visitors who have viewed a certain page as well as their country of origin. It enables our website to remember information that changes the way it behaves or looks, such as your preferred language.*
- **Preference, Targeting & Advertising Cookies.** *These cookies are used to advertise across the internet and to display relevant ads tailored to Visitors based on the parts of the website they have visited (e.g., the cookie will indicate you have visited a certain webpage and will show you ads relating to that webpage).*

You may find more information about the cookies we use as well as opt-out of cookies or change your preferences at any time by using the cookies setting tool available on the footer of our website.

Where we use third-party advertising cookies, such third-party may independently collect, through the use of such tracking technologies, some or all types of Personal Data detailed above, as well as additional data sets, including to combine such information with other information they have independently collected relating to your online activities across their network of websites, for the purpose of enhanced targeting functionality and delivering personalized ads, as well as providing aggregated analytics related to the performance of our advertising campaign you interacted with. These third parties collect and use this information under their own privacy policies, and we are not responsible for their privacy practices.

F. DATA SHARING – CATEGORIES OF RECIPIENTS WE SHARE PERSONAL DATA WITH:

We share your data with third parties, including our partners or service providers that help us operate and make the most of the website. You can find here information about the categories of such third-party recipients.

Categories of Recipients	Additional Information
Our Affiliated Companies, including any company of Mastercard global groups	We may share Personal Data with our affiliated companies and subsidiaries in order to provide joint services (e.g., marketing), improving our services, etc.
Governmental Authorities related to our programs	We may share your Personal Data with certain governmental authorities and agencies which supports and related to our programs, labs and accelerators, such as the Israel Innovation Authority or the Israel National cyber Directorate.

Categories of Recipients	Additional Information
Our Service Providers	<p>We share your Personal Data with our trusted service providers and business partners that perform business operations for us on our behalf (as data processors) and pursuant to our instructions.</p> <p>This includes the following categories of service providers:</p> <ul style="list-style-type: none"> ● Advertising and marketing service providers, who help us with advertising measurements, email marketing, etc.; ● Data storage providers, with whom we entrust the hosting and storage of our data; ● Consent Manager (CMP), an external service that provides us with the ability to allow website visitors to control and manage their cookies preferences and consent; ● General IT and SaaS providers – providing us with IT systems for the management of our daily conduct; ● Data analytics and data management providers, who help us improve, personalize and enhance our operation. ● Data security partners, who help us detect and prevent potentially illegal acts, violations of our policies, fraud and/or data security breaches and ensure compliance with legal obligations.
Legal and Law Enforcement	<p>We may disclose certain Personal Data to law enforcement, governmental agencies, or authorized third parties, in response to a verified request relating to criminal investigations or alleged illegal activity or any other activity that may expose us, you, or any other Visitor to legal liability, and solely to the extent necessary to comply with such purpose.</p>
Corporate Transactions	<p>In the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation, or asset sale) we will share the Personal Data we store with our acquiring company.</p> <p>In any such case, we will oblige the acquiring company to assume the rights and obligations as described in our Privacy Policy.</p>

When we share information with service providers and partners, we ensure they only have access to such information that is strictly necessary for us to operate the website. These parties are required to secure the data they receive and to use the data for pre-agreed purposes only while ensuring compliance with all applicable data protection regulations (such service providers may use other non-personal data for their own benefit).

G. DATA RETENTION:

In general, we retain the Personal Data we collect for as long as it remains necessary for the purposes set forth above, all under the applicable regulation, or until you express your preference to optout, where applicable.

Transactional Data, such as invoices, record keeping regarding your purchase, etc., will be kept for long periods and sometimes without limitation, as such data is part of our internal record keeping.

Other circumstances in which we will retain your Personal Information for longer periods of time include: (i) where we are required to do so in accordance with legal requirements, or (ii) for us to have an accurate record of your interaction with us in the event of any inquiries or contact requests, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data. Please note that except as required by applicable law, we will not be obligated to retain your data for a particular period, and we may delete it for any reason and at any time, without providing you with prior notice of our intention to do so.

H. SECURITY MEASURES:

We take great care in implementing physical, technical, and administrative security measures for the website that we believe comply with applicable regulation and industry standards to prevent your information from being accessed without the proper authorization, improperly used or disclosed, unlawfully destructed, or accidentally lost.

If you feel that your privacy was not dealt with properly or was dealt with in a way that was in breach of our Privacy Policy or if you become aware of a third party's attempt to gain unauthorized access to any of your Personal Data, please contact us at our email.

I. INTERNATIONAL DATA TRANSFER:

Basically, we operate from and in Israel. However, due to certain global aspects of our business operation, such as our affiliation to Mastercard global groups, or through our use of third-party vendors, we may store or process your Personal Data in several territories. Thus, your Personal Data may be transferred to and processed in countries other than the country from which you accessed our websites or otherwise the country of your jurisdiction. We will always take appropriate measures to ensure that your Personal Data receives an adequate level of data protection upon its transfer in accordance with applicable law.

Further, when Personal Data collected within the EU is transferred outside the EU (and not to a recipient in a country that the European Commission has decided provides adequate protection) it shall be transferred under the provisions of the [standard contractual clauses](#) approved by the European Union. If you would like to understand more about these arrangements and your rights in connection therewith, please contact us at our email.

In addition, some of the third parties used for cookies management on our website may store and process data globally, including in the US (e.g., Google Analytics servers). When granting consent for such cookies through the cookies tool on the website, you hereby acknowledge and approve such cross-border transfer, in accordance with such third party's privacy practices.

J. YOUR RIGHTS

Applicable privacy laws may grant you certain rights with regards to your Personal Data, including, according to your jurisdiction, one or all of the following: (i) request to amend your Personal Data we store accessing; (ii) review and access your Personal Data that we hold; (iii) request to delete your

Personal Data that we hold (as long as we do not have a legitimate reason for retaining the data); (iv) restrict or object to the process your Personal Data; (v) exercise your right of data portability (vi) contact to a supervisory authority in your jurisdiction and file a complaint; and (vii) withdraw your consent (to the extent applicable).

If you wish to submit a request to exercise your rights, please approach us through our email at: info@finseclab.com. Subject to your applicable rights per your jurisdiction, we may sometimes reject your request, while providing you a detailed explanation of such rejection. In such case, you may always appeal in front of the relevant authorities and competent courts.

When you contact us and request to exercise your rights regarding your Personal Data, we will require certain information from you in order to verify your identity and locate your data and that the process of locating and deleting the data may take reasonable time and effort, as required or permitted under applicable law.

Data privacy and related laws in your jurisdiction may provide you with different or additional rights related to the data we collect from you, which may also apply.

K. THIRD PARTY WEBSITES:

Our Privacy Policy only addresses the use and disclosure of Personal Data we collect from you. To the extent that you disclose your Personal Data to other parties via the website (e.g., by clicking on a link to any other website or location), different rules may apply to their use or disclosure of the Personal Data you disclose to them, and this Privacy Policy does not apply to any such third-party products and services. You agree that we shall have no liability whatsoever with respect to such third-party sites and your usage of them.

L. ELIGIBILITY AND CHILDREN PRIVACY:

The website is not intended for use by children (the phrase "child" shall mean an individual that is under the age defined by applicable law, which concerning the EEA is under the age of 16, and with respect to the US, under the age of 13), and we do not knowingly process children's information. We will discard any information we receive from a user that is considered a "child" immediately upon discovering that such a user shared information with us.