

## Privacy Notice

### INTRODUCTION

Thank you for choosing to be part of our community at Obrecsys, operated by Obrecsys IL Ltd. (“Obrecsys”, “We”, “Us”, or “Our”). We are committed to protecting your personal information and your right to privacy.

When this privacy notice uses the term "Managers" We refer to event managers or campaign managers using the Services, as defined below, to create events or marketing campaigns for their audience ("Audience") or for Managers' service providers, such as hosts, co-hosts, co-managers ("Team Members"), or for any other reason. Managers and third parties using Our Services are all referred to in these Terms collectively as "you" or "your".

We process Audience Information on behalf of and under Managers and Team Members instructions, in accordance with Our data processing agreement. To learn about the privacy policy and practices of Managers and Team Members, please contact them directly.

"Audience Information" means personal information that we collect, process, and manage on behalf of Managers and Team Members, as part of rendering Our Services through Our Platforms.

This privacy notice applies to all information collected through Our platforms, and/or any related services, sales, marketing or campaigns (We refer to them collectively in this privacy notice as the "Platforms" or "Services"). and applies for Managers and Team Members and Audience with the required specific content referred, if and when required.

We take your privacy very seriously, in this privacy notice, We seek to explain to you in the clearest way possible what information We collect, how We use it and what rights you have in relation to it.

**Please read this privacy notice carefully as it will help you make informed decisions about sharing your personal information with us.**

If there are any terms in this privacy notice that you do not agree with, please discontinue use of Our Platforms and Our Services.

### WHAT INFORMATION DO WE COLLECT?

When We talk about “Personal Information” in this privacy notice, We mean all of the information collected by Us as detailed below, as long as this information is by itself or with other data or information, We possess identify you or any other individual.

*Specifically, We collect the following information by the following means:*

*Personal information you disclose to Us:*

*The Short Story: We collect personal information that you provide to Us such as name, email address, location data, contact information, including country of residence, passwords and security data, payment information, and social media login data.*

We collect personal information that you voluntarily provide to Us:

- Registering at the Platforms as "Managers" or "Team Members";
- When you sign to Our Platforms;
- When you interact with Our customer support;
- When you upload photos to the Platforms;
- When you share photos through the Platforms with Us, your Audience or other users;
- When you share with Us text and documents;
- When you submit a request to exercise a right identified in this policy, in order to fulfill your request, We may collect your email address, contact information, photo, or an image of your government-issued ID.

Personal information you disclose to Us include the following:

**App information.** When you or your Audience log into Our App, We collect device data, including a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network

interface, or the mobile phone number used by the Device) mobile network information, its mobile operating system, time zone setting and location.

**Credentials and Account Data.** When you create an account or interact with Our Platforms, We collect your first and last name, title, email address, postal address, phone number, company name, and other similar contact data passwords, password hints, and similar security information used for authentication and account access and general accesses to Our Services and Platforms.

**Payment Data.** We collect data necessary to process your payment if you make any purchases through Our Platforms, such as the last 4 digits of your payment instrument number (such as a credit card number), and billing address. Other than that, all other payment data is stored by Our payment processor Stripe, and you should review their privacy policies found here:

- <https://stripe.com/privacy>

Audience Information that We collect on behalf of you include the following:

**Photos, Text and Documents you share with Us to be processed for the provisions of Our Services.** Some of this information is collected for Our own purposes as detailed in this privacy notice and other times on behalf of Our You.

**Biometric data and other metadata information derived from photos:** As part of Our normal business operations, We collect Audience's photos through Our Services. Such photos are uploaded by Managers, Team Members or someone on your behalf to Our Platform. We extract information from those photos including geolocation and digital representation of distinct characteristics of an individual's face measurements used for facial recognition.

All personal information that you provide to Us must be true, complete and accurate, and you must notify Us of any changes to such personal information.

**You also represent and warrant to Us that you have the full right and authority and received all necessary consents and approvals (in such cases where such consent and approvals are required) from your Audience to share with Us Audience Information or any other personal information.**

You are fully responsible for ensuring that each member of your Audience has given his consent to the use and processing of his/her personal information by Us.

We do not control the registration and onboarding process of your Audience, nor the personal information that you or your Team Members collect.

In addition, other third parties that are involved on your behalf with regard to an event or marketing campaign or any other activity may receive Audience Information as well. In that case, We may provide Audience Information to such third parties as per your specific instructions and on your behalf.

**All processing of such Audience Personal Information shall be done according to your instructions and a signed data processing agreement, and evidently, We are not responsible for any actions of you, your Team Members (or other downstream recipients of Audience Information), with respect to the Audience Information.**

***Information automatically collected:***

***The Short Story:*** Some information – such as IP address and/or browser and device characteristics – are collected automatically when you log into Our Platforms and use Our Services. This information is primarily needed to maintain the security and operation of Our Platforms, the provisions of Our Services and for Our internal analytics and reporting purposes.

Personal information We automatically collect does not reveal your specific identity (like your name or contact information) but may include the following:

- Device and usage activity, such as your IP address, browser and device characteristics, mobile network information, and login history;
- Country, location, information about how and when you use Our Platforms and other technical information.

- The Platforms also may access metadata and other information associated with other files stored on your device. This may include, for example, photographs, audio and video clips, personal contacts, and address book information.

***Information collected from other Sources:***

***The Short Story:*** We may collect limited data from public databases, marketing partners, social media platforms, and other outside sources.

We may obtain information about you from other sources, such as public databases, joint marketing partners, social media platforms (such as Facebook, Instagram, Google, Twitter and LinkedIn), as well as from other third parties.

Examples of the information We receive from other sources include:

Your name, gender, birthday, email, current city, state and country, user identification numbers for your contacts, profile picture URL and any other information that you choose to make public.

**HOW DO WE USE YOUR INFORMATION AND INFORMATION WE COLLECT ON YOUR BEHALF?**

We use information that We collect about you or that you provide to Us or We collect on behalf of you (for example, Audience Information), including any personal information such as your first and last name, email address, postal address, phone number, company name, and other similar contact data, to:

- Provide you with the Platforms, its contents and Our Services, and any other information, products or services that you request from Us.
- Pair Audience Information with the biometric data and other metadata information derived from photos, as part of Our core Services.
- Identify your Audience in photos taken on events or for marketing campaigns and which are uploaded to Our Services, using facial recognition software in order to create grouped personalized albums.

How facial recognition works:

Facial recognition is used by Us to analyze photos uploaded to the Platforms and create a digital representation of distinct characteristics of an individual's face, representing information extracted from a photograph or a live individual, using a facial recognition algorithm ("**Template**"). When a member of your Audience uploads a photo to Our Platforms, We create a Template of each individual member of your Audience and use it to identify if the User appears in any of the uploaded photos. The Managers, then have the option to group such photos and to send to Audience the specific photos in which they appear.

- Fulfill any other purpose for which you provide it.
- If you create an account, register to Our newsletter or otherwise approve communications with us, to give you notices about your account, including expiration and renewal notices.
- Carry out Our obligations and enforce Our rights arising from any contracts entered into between you and us, including for billing and collection.
- Notify you when Our Platforms are available, and of changes to any products or services We offer or provide through it.
- Request feedback and to contact you about your use of Our Platforms and Services.
- Keep Our Platforms, you and the Audience safe and secure (for example, for fraud monitoring and prevention).

The usage information We collect helps Us to improve Our Platforms and to deliver a better and more personalized experience by enabling Us to:

- Estimate Our users' size and usage patterns.
- Store information about your preferences, allowing Us to customize Our Platforms according to your individual interests.

- Speed up your searches.
- Recognize you and the Audience when using the Platforms.

## HOW WE SHARE YOUR INFORMATION?

*The short story:* We only share information with your consent, to comply with laws, to protect your rights, or to fulfill Our contract and legal obligation to you or other business obligations.

We only share and disclose your information in the following situations:

- **With your Consent.** We may disclose your personal information for any other purpose with your consent.
- **Compliance with Laws.** We may disclose your information where We are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests and Legal Rights.** We may disclose your information where We believe it is necessary to investigate, prevent, or take action regarding potential violations of Our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which We are involved.
- **Affiliates.** We may share your information with Our affiliates, in which case We will require those affiliates to honor this privacy notice. Affiliates include Our parent company and any subsidiaries, joint venture partners or other companies that We control or that are under common control with us.
- **Business Partners, Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for Us or on Our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Platforms, which will enable them to collect data about how you interact with the Platforms over time. These service providers may have access to your personal information, depending on each of their specific roles and purposes, and may only use it for such limited purposes as determined in Our agreements with them. For a list of Our current list of affiliates, business partners, vendors, consultants and Other Third-Party service providers, please contact Us at [info@Obrecsys.com](mailto:info@Obrecsys.com).
- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of Our business to another company.
- **Third-Party Advertisers.** We may use third-party advertising companies to serve ads when you logged into the Platforms. These companies may use information about your connecting to Our Platforms and other tracking technologies in order to provide advertisements about goods and services of interest to you. Please see their Cookie Policy for further information.

## INTERNATIONAL TRANSFERS

Our servers are located in Israel and the USA. Please be aware that your information may be transferred to, stored, and processed by us in Our facilities and by those third parties with whom we may share your personal information in the USA and Israel.

If you are a resident in the European Economic Area, please be advised that all transfers to Israel are based on "Adequacy Decision" and all transfers to the USA are based on European Commission's Standard Contractual Clauses.

European Commission's Standard Contractual Clauses - The European Commission has determined that the Standard Contractual Clauses provide sufficient safeguards to protect the personal data transferred outside the EU or EEA.

For more information, please visit at [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en).

All such transfer based on Standard Contractual Clauses require all such recipients to protect personal information that they process from the EEA in accordance with European data protection laws. We have implemented similar appropriate safeguards with Our third-party service providers and partners and further details can be provided upon request.

## **SOCIAL MEDIA FEATURES, AD NETWORKS AND DO NOT TRACK**

**The Short Story:** Our Platforms may include certain Social Media features. These Social Media Features may collect certain personal information, your interactions with these third parties' social media Features are governed by their policies and not Ours.

**Due to lack of standardization, currently, Our systems do not recognize browser “do-not-track” requests.**

Our Services may include certain Social Media features, widgets, such as the, “Facebook Like”, or “Share this” button or other interactive mini-programs (“Social Media Features”). These Social Media Features may collect certain personal information such as your IP address and may set a cookie to enable them to function properly. Social Media Features are either hosted by a third party or hosted directly on Our Platforms and Services. Your interactions with these third parties' Social Media Features are governed by their policies and not Ours.

## **THIRD-PARTY WEBSITES AND CONTENT**

**The Short Story:** *We are not responsible for the safety of any information that you share with third-party providers who advertise, but are not affiliated with, Our Platforms.*

The Platforms may contain advertisements from third parties that are not affiliated with Us and which may link to other websites, online services or mobile applications. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy notice. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services or applications that may be linked to or from the Platforms. You should review the policies of such third parties and contact them directly to respond to your questions.

## **HOW LONG DO WE KEEP YOUR INFORMATION?**

**The Short Story:** *We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.*

The Platforms may contain advertisements from third parties that are not affiliated with Us and which may link to other websites, online services or mobile applications. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy notice. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services or applications that may be linked to or from the Platforms. You should review the policies of such third parties and contact them directly to respond to your questions.

## **KEEPING YOUR INFORMATION SAFE**

**The Short Story:** *We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to Us is stored on Our secure servers according to industry standards.

Unfortunately, the transmission of information via the internet is not completely secure. Although We do Our best to protect your personal information, We cannot guarantee the security of your personal information transmitted to Our Platforms. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Platforms.

## **YOUR PRIVACY RIGHTS AND HOW TO EXERCISE THEM?**

**The Short Story:** *In some regions, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.*

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing

of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm)

### ***Subscription and Account Information***

You may at any time review, unsubscribe from Our mailing list, change the information in your account or terminate your account by:

- Logging into your account settings and updating your account.
- Adjusting your device or App permissions.
- Contacting Us using the contact information provided below.

Upon your request to unsubscribe or terminate your account, We will deactivate or delete your account and information from Our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce Our Terms And Conditions and/or comply with legal requirements.

**Opting Out** - If you do not want Us to collect your information do not download the App or delete it from your device and do not use Our Services. In addition, you may opt-out at any time by contact Us at [info@Obrecsys.com](mailto:info@Obrecsys.com).

### **Children Under the Age of 13**

The Services are not intended for children under 13 years of age, and We do not knowingly collect personal information from children under 13. If We learn We have collected or received personal information from a child under 13 without verification of parental consent, We will delete that information. If you believe We might have any information from or about a child under 13, please contact Us at [info@Obrecsys.com](mailto:info@Obrecsys.com).

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see Your California Privacy Rights below for more information.

### **DATA CONTROLLER/PROCESSOR AND DATA PROCESSING AGREEMENTS**

***The short story:*** *We are the controller of some of your personal information; we are the processor of any personal information processed on your behalf.*

In some incidents We may be the “Data Controller” of personal information not specifically excluded above. In such instances, Our service providers processing such data will assume the role of “Data Processor”.

If you upload or submit information / data or other content to our Platforms or through Our Services and products which includes personal information, such data will only be processed by Us on behalf of you. In such instances, you shall be deemed the “Data Controller” of such data or information, and We will process such information on your behalf, as your “Data Processor”, in accordance with your reasonable instructions, Our data processing agreement with such customer (to the extent applicable) and other commercial agreements. Our service providers shall act as designated Sub-Processors in these instances.

You will be responsible for meeting any legal requirements applicable to Data Controllers (such as establishing a legal basis for processing and responding to Data Subject Rights requests concerning the data they control).

**If applicable, Our data processing agreement can be provided upon request.**

### **RIGHTS OF CALIFORNIA RESIDENTS**

If you are a California resident, California law may provide you with additional rights regarding Our use of your personal information. To learn more about your California privacy rights, please visit at [www.Obrecsys.com/ccpa](http://www.Obrecsys.com/ccpa).

## **RIGHTS OF NEVADA RESIDENTS**

As a Nevada resident you have the right to request to opt-out of the sale of your personal information, by contacting Us at [info@Obrecsys.com](mailto:info@Obrecsys.com). please contact Us using the contact information provided below and include the email address associated with your account and a statement that you reside in Nevada.

## **RIGHTS OF ILLINOIS RESIDENTS**

If you are a resident of Illinois, you are granted specific rights regarding your Biometric information.

To the extent that the Illinois Biometric Information Act applies to information in Obrecsys's possession, this policy shall control how Obrecsys retains and destroys that information.

As part of Obrecsys's evaluation of its ongoing business practices, Obrecsys has decided to maintain biometric information that Obrecsys can reasonably associate with Illinois (the "Illinois Information") solely for the purpose of complying with Obrecsys's ongoing legal obligations. Obrecsys will block the Illinois Information from being returned by future searches through the Platforms. Obrecsys will retain the Illinois Information for so long as it is required to do so pursuant to legal information preservation obligations.

Illinois residents can send a request to opt-out of appearing in Obrecsys search results at [info@Obrecsys.com](mailto:info@Obrecsys.com).

## **UPDATES TO THIS NOTICE**

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If We make material changes to this privacy notice, We may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how We are protecting your information.

## **HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**

If you have questions or comments about this notice, email Us at [info@Obrecsys.com](mailto:info@Obrecsys.com) or by post to:

Obrecsys IL Ltd.

Attn: Legal Department

Bldg C, Ste C, C/O Victor

3349 Hwy138

Wall, NJ 07119

US