

WEBSITE PRIVACY POLICY

Last Revised:

Hexagate Ltd., (“Hexagate” “Company,” “we,” “our” or “us”) respects the privacy of the visitors and/or users of its Site (“User(s)” or “you”) and is committed to protecting the personal information that its Users share with it.

This privacy policy (the “Site Privacy Policy”) is intended to describe our practices regarding the information we may collect from you when you use and access our Site located at <https://www.hexagate.com/> and any of their respective sub-domains (each, a “Site” and collectively, the “Sites”).

Capitalized terms which are not defined herein, shall have the meaning ascribed to them in our Site Terms of Use available at https://extension.hexagate.com/terms_of_use.pdf (the “Site Terms of Use”), which this Site Privacy Policy is incorporated thereto by reference.

1. Scope and Applicability

This Site Privacy Policy applies only in connection with your use of the Site. This Site Privacy Policy does not apply to any use of the Solution (as such term is defined in the Site Terms of Use) and other related services, which is governed solely by its Subscription Terms (the Site Terms of Use and the Site Privacy Policy shall be regarded collectively herein as the “Hexagate Website Terms”).

2. Your Consent (PLEASE READ CAREFULLY!)

BY ENTERING, CONNECTING TO, ACCESSING OR USING THE SITE, YOU AGREE TO THE TERMS AND CONDITIONS SET FORTH IN THIS SITE PRIVACY POLICY, INCLUDING THE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION (AS DEFINED BELOW). IF YOU DISAGREE TO ANY TERM PROVIDED HEREIN, YOU MAY NOT ACCESS AND/OR USE THE SITE IN ANY MANNER WHATSOEVER.

To the extent that your use or access to the Site are made on behalf of another legal or natural person, such access and use must be conducted in strict compliance with the Hexagate Website Terms and at your sole responsibility, and you hereby represent that you received the required consent, authority, permission and approval of such person to provide Personal Information (as defined below) and to allow Hexagate to collect, store, and use such Personal Information in accordance with this Site Privacy Policy.

PLEASE NOTE: YOU ARE NOT OBLIGATED TO PROVIDE US WITH ANY PERSONAL INFORMATION. YOU HEREBY ACKNOWLEDGE AND AGREE THAT YOU ARE PROVIDING US WITH SUCH PERSONAL INFORMATION VOLUNTARILY, FOR THE PURPOSES DESCRIBED UNDER THIS SITE PRIVACY POLICY, AND THAT WE MAY USE, PROCESS AND RETAIN SUCH PERSONAL INFORMATION IN ACCORDANCE WITH THIS SITE PRIVACY POLICY AND SUBJECT TO ANY APPLICABLE LAWS AND REGULATIONS.

3. Which Information Do We Collect on our Users?

We may collect the following types of data and information from our Site Users:

- **Non-Personal Information:** any information that is non-identifiable and anonymous information (“**Non-personal Information**”). Non-Personal Information is collected without particular reference to the identity of the applicable User from or about whom such information was collected and is available to us while such User is entering and/or using the Site. Non-Personal Information which is being collected consists of technical, behavioral, and aggregated information, and may contain, amongst other, the activity of the User on our Site, type of operating system, User’s ‘click-stream’ on the Site and which links the User used, type of browser and keyboard features, browser history, User demographics, traffic patterns, etc.

- **Personal Information:** any information that identifies an individual, or may with reasonable effort, identify an individual, either alone or in combination with other information (“**Personal Information**”). Personal Information may be of private or sensitive nature of a User or identify an individual. Users may be asked to provide certain Personal Information including, without limitation, first and last name, email address, login password, description of the employer’s business, and to the extent that you provide us information when contacting us we may also receive any types of Personal Information provided under such communication which you provide to us of your own volition.

4. How We Collect Information of Our Users?

There are a few main methods that we use:

- **Non-Personal Information is collected through your use of the Site.** We may be aware of your use and/or access of the Site, and may gather, collect, and record the information relating to such usage, either independently or through third-party services as detailed below. We may also collect Non-personal Information through the analysis aggregation and anonymization of Personal Information provided by you.

- **Personal Information you provide us voluntarily.** For example, we collect Personal Information when you use the “Request Access” button or when you click the “I want in” button which allow you to learn about, or register to our services including when you contact us to receive a demonstration of Hexagate’s Solution and/or require support in connection with your use of the Hexagate Solution.

- **Personal Information that we collect automatically when you use or access the Site** . This is information which we automatically receive upon you access or interact with our Site. This information may include:

- IP address, UDID (Unique Device Identifier) or other persistent user and/or mobile device token (as applicable), geolocation, advertising ID, device type, operating system, browser type and version, browser history, screen resolution, browser and keyboard language, the User’s ‘click-stream’ and activities on the Site, the period of time the User visited the Site and related time stamps.

We will not collect any Personal Information from you or related to you without your approval, which is obtained, inter alia, through your active acceptance of the Hexagate Website Terms.

5. The Purposes and Legal Basis of the Collection, Processing and Use of Information

Legal Basis for Use

We collect, process, and use your Personal Information for the purposes described in this Site Privacy Policy, based at least on one of the following legal grounds:

- **In Performing an Agreement with You:** We collect and process your Personal Information in order to provide you with the Site, following your acceptance of this Site Privacy Policy and pursuant to the Site Terms of Use; to maintain and improve our services to you; to develop new services and features for our Users; and to personalize the use of the Site in order for you to get a better user experience.
- **With Your Consent:** We ask for your consent to collect and process your information for specific purposes and you have the right to withdraw your consent at any time.
- **Legitimate Interest:** We process your information for our legitimate interests while applying appropriate safeguards that protect your privacy. This means that we process your information for things like detecting, preventing, or otherwise addressing fraud, abuse, security, usability, functionality or technical issues with our services, protecting against harm to the rights, property or safety of our properties, or our users, or the public as required or permitted by law; Enforcing legal claims, including investigation of potential violations of this Site Privacy Policy; in order to comply and/or fulfil our obligation under applicable laws, regulation, guidelines, industry standards and contractual requirements, legal process, subpoena or governmental request, as well as our Site Terms of Use.

Purpose of Use

We may use the Personal Information that we collect about you for the following purposes:

- To provide, operate, and improve the Site for our Users and to manage our business including by creating targeted advertisement campaigns.
- To send you updates, notices, notifications, and announcements related to the Site as well as newsletters, coupons, commercial offers, and additional communications regarding the Hexagate Solution and our services.
- To enable us to provide you with customer support services and to further develop, customize, and improve the service based on Users' common preferences, uses, attributes and anonymized or de-identified data.
- To create cumulative statistical data and other cumulative information and/or other conclusive information that is non-personal, to enable us to improve our Site and provide Users with a better user experience with more relevant and accurate information, services, third-party services, features and functionalities, statistical and research purposes, etc.
- To prevent, detect, mitigate, and investigate fraud, security breaches or other potentially prohibited or illegal activities.

- To comply with any applicable rule or regulation, to protect our legal interests and/or respond to or defend against (actual or potential) legal proceedings against us or our affiliates.

6. Sharing Information with Third Parties

Hexagate will not share or otherwise allow access to any Personal Information it collects, or that you provide through the Site to any third party, except in the following cases:

- **Law enforcement, legal proceedings, and as authorized by law:** We may disclose Personal Information to satisfy any applicable law, regulation, legal process, subpoena, or governmental request.

- **Protecting Rights and Safety:** We may share Personal Information to enforce this Site Privacy Policy and/or the Site Terms of Use, including investigation of potential violations thereof; to detect, prevent, or otherwise address fraud, security or technical issues; to respond to claims that any content available on the Site violates the rights of third-parties; to respond to claims that contact information (e.g. name, e-mail address, etc.) of a third-party has been posted or transmitted without their consent or as a form of harassment; and to protect the rights, property, or personal safety of Hexagate, any of its Users, or the general public.

- **Our Affiliated Companies:** We may share Personal Information internally with our family of companies for the purposes described in this Site Privacy Policy. In addition, when Hexagate or any of our affiliated companies is undergoing any change in control, including by means of merger, acquisition, or purchase of all or substantially all of its assets, we may share Personal Information with the parties involved in such event. If we believe that such change in control might materially affect your Personal Information then stored with us, we will notify you of this event and the choices you may have via e-mail and/or prominent notice on our Site.

- **Our Business Partners:** We may share Personal Information with our business partners (e.g., Avalanche (BVI), Inc.) who have assured us that they implement all means necessary to ensure the protection of your Personal Information.

- **Third Party Services:** We partner with certain third parties to provide selected services that are used to facilitate and enhance the Site and your use thereof ("**Service Providers**"). Such third-party Service Providers may have access to, or process on our behalf Personal Information which we collect, hold, use, analyze, process and/or manage. These Service Providers include hosting, database and server co-location services, data analytics services (e.g., Google Analytics), remote access services, data and cyber security services, fraud detection and prevention services (e.g., Amazon Web Services), e-mail and text message distribution and monitoring services, authentication services (e.g., Auth0) payment processors, customer relations management and support (e.g., HubSpot), and our business, legal and financial advisors (collectively, "Third Party Service Providers"). We remain responsible for any Personal Information processing done by Third Party Service Provider on our behalf, except for events outside of our and/or their reasonable control, and except with respect to Third Party Service Providers with which you are contractually engaged,

either through a prior separate contractual engagement and/or through acceptance of their privacy policy and terms of use if such are referenced herein.

For avoidance of doubt, Hexagate may transfer and disclose to third parties or otherwise use Non-personal Information at its own discretion.

7. Storage, Transfer and Retention of Your Information

Information regarding the Users will be maintained, processed, and stored by us and our authorized affiliates and service providers in Virginia, USA.

While the data protection laws in the above jurisdictions may be different than the laws of your residence or location, please know that we, our affiliates, and our service providers that store or process your Personal Information on our behalf are each committed to keep it protected and secured, pursuant to this Site Privacy Policy and industry standards, regardless of any lesser legal requirements that may apply in their jurisdiction.

Specifically, each of our Third Party Service Providers which store or process your Personal Information either: (i) assured us that they provide adequate safeguards to protect your rights to privacy; (ii) where applicable, hold and process such information on our behalf in a jurisdiction which has been determined to ensure an adequate level protection by the EU Commission; (iii) perform such processing pursuant to your consent and acceptance of their privacy policy as further detailed above.

By providing your information, you expressly consent to the place of storage and transfer, including transfers outside of the jurisdiction in which the information was provided.

We retain the Personal Information we collect only for as long as needed in order to provide you with use of our Site in accordance with the terms of this Site Privacy Policy and to comply with applicable laws and regulations or otherwise as required for us to protect against claims by Users for the relevant statute of limitations period. We then either delete from our systems or anonymize it without further notice to you.

8. Updating, Obtaining A Copy of, Or Deleting of Personal Information

If for any reason you wish to exercise any rights to which you are entitled, under the law applicable to you, such as correction, deletion, access to and notification of the types of your Personal Information processed by us or on our behalf, you may do so by contacting Hexagate at support at customers@hexagate.com. When handling these requests, we may ask for additional information to confirm your identity and your request.

Subject to limitations pursuant to applicable law and if entitled to the same thereunder, if you wish to exercise your right to access your Personal Information, you may be able to obtain the Personal Information you directly provided us (excluding data we obtained from other sources) in a structured, commonly used, and machine-readable format and may have the right to transmit such data to another party. We may provide such access through the Site.

Please note, that upon request to delete your Personal Information, we will delete any such Personal Information pursuant to any applicable privacy laws or otherwise, we may de-identify any such Personal Information and thereby transform it to become Non-Personal Information. We may retain such data in whole or in part to comply with any applicable rule or regulation and/or to respond or defend against legal proceedings against us or our affiliates.

The rights available to you in connection with your Personal Information may also include the following:

- **Right of access.** You may have a right to know what information we hold about you and, in some cases, to have the information communicated to you. We reserve the right to ask for reasonable evidence to verify your identity before we provide you with any information.
- **Right to correct Personal Information.** We endeavor to keep the information that we hold about you accurate and up to date. Should you realize that any of the information that we hold about you is incorrect, please let us know and we will correct it as soon as we can.
- **Data deletion.** In some circumstances, you have a right to request that some portions of the Personal Information that we hold about you be deleted or otherwise anonymized.
- **Data portability.** In some circumstances, you may have the right to request that data which you have provided to us is provided to you, so you can transfer this to another data controller.
- **Restriction of processing.** In some cases, you may have the right to request a restriction of the processing of your Personal Information, such as when you are disputing the accuracy of your information held by us.

To find out whether these rights apply to you and on any other privacy related matter, you can contact your local data protection authority if you have concerns regarding your rights under local law.

9. Minors

To accept the terms of this Site Privacy Policy, you must be over the age of eighteen (18) years old. If you are between 16 and 18 years of age, then you must review this Site Privacy Policy with your parent or guardian before visiting or using our Site to make sure that you and your parent or guardian understand and agree to these terms. Without relieving you of your responsibility to comply with the Site Terms of Use and the terms hereof we reserve the right (without obligation) to request proof of age at any stage so that we can verify that minors under the age of eighteen (18) are not using our Site.

In the event that we learn that a person under the age of eighteen (18) is using our Site, not in accordance with the above-mentioned terms, we will use our best efforts to prohibit and block such User from accessing our Site and will use our best efforts to promptly delete any Personal Information.

10. Local Storage and Third-Party Software/Service, Cookies, and other Tracking Technology

Local Storage

When you access or use the Site , we may use industry-wide technologies which temporarily store certain information on your end device (such as your smartphone, your computer or other browsing device) (“**Local Storage**”), and which will allow us to enable proper use of the Site , automatic activation of certain features, make your browsing experience much more convenient and effortless and to provide our customers and potential customers with more relevant advertisements of the Hexagate Solution and our related services. The Local Storage is created per session and may be deleted or otherwise configured by you to not accept any such local storage.

Monitoring and Tracking Technologies

We also use certain monitoring and tracking technologies, including ones offered by Third Party Service Providers, in order to collect and process the Personal Information specified above. For example, these technologies enable us to: (i) keep track of and apply our customer’s and potential customers’ Site preferences and authenticated sessions; (ii) better secure our Site by detecting abnormal behaviors; (iii) identify technical issues and improve the overall performance of our Site; and (iv) create and monitor analytics relating to use of our Site.

Cookies and Other Tracking Technologies

A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the website again, the cookie allows that site to recognize your browser. A pixel tag (also known as a web beacon) is a piece of code embedded on the site that collects information about users’ engagement on that web page. Cookies and similar technologies may store unique identifiers, user preferences and other information. You can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or services may not function properly without cookies. To learn more about tracking technologies please refer to www.allaboutcookies.org Tracking technologies may include Pixel tags (also commonly known as web beacons), transparent images, iFrames, or Java Script placed on our Site or our advertisements and emails, that is used to understand how you interact with the Site, such advertisements and emails.

Some of these tracking technologies are provided to us by our Third-Party Services Providers who collect and process Personal Information on our behalf. These Third-Party Services Providers may have direct contractual relationship with you (such as Google and Facebook), as detailed above.

Additionally, the services provided to us by such Third-Party Services Providers may entail collection and processing of Personal Information by such Third-Party Services Providers, in a scope which is broader than the scope of Personal Information we are eventually provided with by such Third-Party Services Providers. This means that sometimes these Third-Party Services Providers have access to more of your Personal Information than we do. To the extent you have direct contractual relationship with any of our Third-Party Services Providers, as further detailed above, any rights you may have with respect to your information, collected by such Third-Party Services Providers, shall be governed by such contractual relationship. Otherwise, the terms of this Site Privacy Policy shall fully apply.

In this context you should note that we may use certain third parties’ services, such as Google Analytics, Facebook, Twitter, LinkedIn and/or YouTube, using functionality of re-marketing through their tracking

cookies and pixel-based re targeting services. This means that if you provided your consent to Google, Facebook Twitter, LinkedIn and/or YouTube (the “**Social Ad Platforms**”) to be provided with personalized commercial offers, you may be served with ads (including advertisements of third parties) based on your access to the Site, outside of the Site and across the internet. Please visit the Social Ad Platforms Privacy policy to find out how they use such information. If you wish to opt-out of such re-targeting and tracking functionality of the Social Ad Platforms, you may do so by accessing the settings of the applicable platform.

PLEASE NOTE – such tracking and targeting by Social Ad Platforms, is provided pursuant to your engagement with such Social Ad Platforms and the actual nature and scope of Personal Information collection and processing performed by such Social Ad Platforms is not transparent to us. If you would like to learn more or make further inquiries with respect to such nature or scope, please refer to each of such Social Ad Platforms directly.

Learn more about your choices and how to opt-out of tracking technologies: In order to delete or block any tracking technologies, please refer to the “Help” area on your internet browser for further instructions. You may also opt out of third-party tracking technologies by following the relevant instructions provided by each such third party in its privacy policy or by visiting any of the following:

- www.youronlinechoices.eu
- <http://optout.networkadvertising.org/?c=1>
- <http://www.aboutads.info/choices/>

Please note however that deleting any of our tracking technologies or disabling future tracking technologies may prevent you from accessing certain areas or features of our Site or may otherwise adversely affect your user experience.

Please also note that we may not respond to the ‘Do Not Track’ setting on your browser as the protocol and form for such setting has not yet been generally accepted.

11. Direct Marketing

If you provide us with your contact details through the Site or for the purpose of receiving from Hexagate different offers with respect to the Hexagate Solution or Hexagate services, you hereby agree that we may use such contact details, in order to contact you, inform you regarding our products and services which may interest you, and send you other marketing material, including news and updates by transmission to the e-mail address or phone number you have provided.

You may withdraw your consent by sending us a written notice via email to the following address: customers@hexagate.com.

12. Security

We have implemented appropriate technical, organizational and security measures, designed to reduce the risk of accidental destruction or loss, or unauthorized disclosure or access to the Site. Hexagate, however, does not and cannot guarantee that unauthorized access will never occur. We urge you to make sure to take appropriate measures to protect your browsing device and employ reasonable physical security means to protect unauthorized access.

Our Users Personal Information, or parts thereof, are hosted on Amazon Web Services at Virginia, USA which provides advanced security features. However, please note that we cannot guarantee that the Personal Information you provide to us when accessing and/or using the Site, will not be exposed as a result of unauthorized penetration to the servers. Nevertheless, we employ industry standard procedures and policies to ensure the safety of its Users' Personal Information and prevent unauthorized use of any such information.

13. Third Party Websites

While using the Site you may encounter links to third party websites and/or services. Please be advised that such third-party websites and/or services are independent from Hexagate and may use cookies and other web-tracking technologies not specified, to collect Non-Personal and/or Personal Information about you. We assume no responsibility or liability whatsoever with regard to privacy matters or any other legal matter with respect to such third-party websites and/or services. We encourage you to carefully read the privacy policies and the terms of use of such third-party websites and/or services, as their terms, not ours, will apply to any of your interactions with such third parties. Hexagate has no control over the use of any information you provide to these third-party services.

14. Changes to the Site Privacy Policy

Hexagate reserves the right to change this Site Privacy Policy at any time, so please re-visit this page frequently. We will provide notice of substantial changes of this Site Privacy Policy on the Site and/or if provided by you, we may choose to send you an e-mail regarding such substantial changes. Such substantial changes will take effect seven (7) days after such notice was provided on any of the above-mentioned methods. Otherwise, all other changes to this Site Privacy Policy are effective as of the stated "Last Revised" date above, and your continued use of the Site after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes.

15. General Information

This Site Privacy Policy and the relationship between you and Hexagate shall be governed by and construed in accordance with the laws of the State of Israel, without regard to its conflict of laws principles. You agree to submit to the personal and exclusive jurisdiction of the courts located in Tel Aviv and waive any jurisdictional, venue or inconvenient forum objections to such courts, provided that Hexagate may seek injunctive relief in any court of competent jurisdiction.

This Site Privacy Policy was written in English and may be translated in the future into other languages. If a translated (non-English) version of this Site Privacy Policy conflicts in any way with the English version, the provisions of the English version shall prevail.

16. Have any Questions?

If you have any questions or comments concerning this Site Privacy Policy, you are welcome to send us an email at customers@hexagate.com and we will make an effort to reply within a reasonable time frame.

By contacting us, you represent that you are free to do so and that you will not knowingly provide Hexagate with information that infringes upon any third-party rights, including any privacy right. You

further acknowledge that notwithstanding anything herein to the contrary, Hexagate may use or refrain from using any such information at its sole discretion.