#### PRIVACY POLICY

Your privacy is important to us. We would like to familiarize you with both the information we use, and how we use it. This privacy policy (the "Policy") describes how The IDC Legal Clinic for Startups (the "Clinic", "us" or "we" or "our") collects and uses information from our website <a href="https://www.legalstart.idc.ac.il">www.legalstart.idc.ac.il</a> (the "Site").

By accessing and using the Site and its' services, you agree to be bound by this Privacy Policy. If you do not agree to any of the provisions as set hereunder in this Privacy Policy, please do not use the Site or any of its services.

This Policy should be read together with the <u>Terms of Use</u> ("**TOU**") which also apply to the Site. This Policy does not apply to other websites that post different statements, regardless of whether or not the Site links to them.

#### 1. AGE OF USE

You must be 18 years old or older to use the Site. If you are under 18, please refrain from using the Site and/or from providing us with any information. We do not knowingly collect information from users under the age of 18. If we become aware that we have collected personal information from a child under the age of 18 years old, we will use reasonable efforts to delete such information.

#### 2. INFORMATION WE MAY COLLECT

- 2.1. Information that you provide us. We may collect some or all of the following personally identifiable information depending on which of our services you chose to use and on the information you provide us. For example when you download a document you will be required to provide your name, email address and payment information (through a secure third party service provider). If you apply to our program, you will be asked to provide details about your venture, your team members, your business plan etc.
- 2.2. **Information Collected Automatically.** We automatically log anonymous information about you and your device in order to improve our services and your experience on the Site. For example, when visiting our Site, we may log your system type, browser type and language and other general statistical information.

The above automatically collected information is collected as by use of:

- Cookies: we may log information using "Cookies". Cookies are small data files stored on your device. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your device until you delete them) to provide you with a more personal and interactive experience on our Platform, for example, cookies help store your username when you login so that you don't have to insert this information every time. You can remove or block cookies from the Platform through your browser settings. You can also block cookies on most mobile devices under "settings". Please note that if you remove or reject our cookies, it could affect how our Platform works for you and/or prevent you from being able to access/use certain features.
- Google Analytics: The site uses the Google Analytics service provided by google Inc. ("Google"). We use Google services for gathering information regarding use of the site, such as, users behaviors like pages visited and visit duration and which web pages perversely visited by you and to evaluate the user's use of the site and to provide site owners with statistics designed to make the site better for the end user. The information collected about the users is stored on Google's servers and is completely anonymous. In addition, the information is not intended to violate the privacy of the individual and is for the sole purpose of being created. The Site may use the Google analytics research tool, provided by google.inc, to collect information about the user's behaviors while in the use of the Platform; this includes but is not limited to, pages visited, visit duration and frequency of your visits to the Platform. We may use Google analytics to preserve and improve Our Site and services. We do not incorporate and/or unify the information collected through the use of Google analytics with personally identifiable information of users on the Site. Google's ability to use and share information collected by Google analytics about the Site users is subject to the Google Analytics Terms of Use available at http://www.google.com/analytics/terms/us.html and the Google Privacy Policy available at: https://policies.google.com/privacy?hl=iw/. You can learn more about how Google collects and processes information, especially through Google Analytics at http://www.google.com/policies/privacy/partners/. You can prevent data from being used by Google analytics by downloading and installing the Google analytics Opt-out Browser Add-on which is available at <a href="https://tools.google.com/dlpage/gaoptout/">https://tools.google.com/dlpage/gaoptout/</a>.

- Browser Information: most browsers automatically relay information to websites that users visit, including type of computer, screen resolution, operating system and browser type.
- <u>Pixel tags and all similar technologies</u>: pixel tags allow us to track actions taken on the site, in emails that we send, and statistically analyze activity on our Site.
- IP Address: Your IP address is an identifying number automatically designated to your computer by your Internet Service Provider. All IP addresses are automatically saved in our logs, as well as page views, time and place of the visit, and help us generate usage statistics and diagnose various server problems.

### 3. HOW WE USE PERSONAL INFORMATION.

We use your personal information as follows:

- 3.1.Provide you with our services.
- 3.2. Process payments and online purchases.
- 3.3. Operate, maintain, improve and gather feedback on our Site.
- 3.4.To resolve disputes and troubleshoot problems.
- 3.5.Send you information, including confirmations, invoices, updates, security alerts, support and administrative messages, newsletters and marketing material if you agreed to receive it. By signing up to our newsletter you agree to receive marketing and promotional material.
- 3.6.Respond to comments and/or questions and to assist you with any technical support.
- 3.7.Protect, investigate and deter against fraudulent, unauthorized or illegal activity.

#### 4. SHARING OF PERSONAL INFORMATION.

We may share personal information as follows:

- 4.1. With third party service providers in order to provide you with specific services and/or features. For example, if we use third party payment applications or third party mailing services.
- 4.2. When you provide your consent. For example, when you submit your application to our program, we will share it with other team members of the clinic. In some cases you may also allow us to share personal information with third parties, social networks, or other users. Third parties are subject to their own privacy policies.
- 4.3. When we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of our business or assets.

- 4.4.For legal, protection, and safety purposes, including to comply with laws, including those outside your country of residence;
- 4.5.To lawful requests and legal processes.
- 4.6.To protect the rights and property of the Clinic, its agents, customers, and others. This includes enforcing our agreements, policies, and Terms of Use.
- 4.7.In an emergency. This includes protecting the safety of our employees and agents, our customers, or any person.
- 4.8.We may also share general aggregated and/or anonymized data with others for their own uses. This information does not identify you personally.

#### 5. SOCIAL SHARING FEATURES

Our services may integrate with third party social applications and/or services (the "Social Apps") and other related tools which let you share information and actions that you take on our Site by use of the Social Apps, and vice versa (for example, an action you take on our Site may be published on Facebook if your account authorized this activity). Your use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the Social Apps and our Site. Please check the privacy policies of those Social Apps for more information about how they handle the data you share through them.

#### 6. SERVICE PROVIDERS And Third Parties

The Clinic is not responsible for any information sent directly by you to third party service providers, including, but not limited to, legal mentors, external programs, affiliates of the Clinic etc. Furthermore, the Clinic is not responsible for the privacy policies and information management any third parties, including those who link and/or refer to the Clinic and/or the Site. No link to a third party should imply and endorsement or business affiliation with the third party.

#### 7. PROTECTION OF INFORMATION.

Your personal information is protected in several ways: (1) your personal information is stored on secured servers that only selected personnel and contracts have access to via a password. (2) All credit card transactions are SSL (Secure Socket Layer) encrypted which is one of the most common and secure security measures available today. (3) Email authentication for selected services.

Although we use industry standard security measures to protect your personal, there is never a 100% guarantee that information submitted to, maintained on, or transmitted from our systems, or any other web-based system, will be completely secure. Any information you provide is your sole responsibility and subject to this Policy and our Terms of Use. If you feel that your security or personal information have been compromised, please contact us immediately.

#### 8. VIEWING AND UPDATING YOUR INFORMATION.

You may review and edit any of your personal information by accessing your profile (if one exists) or by sending us a request by email. When necessary, we may keep specific identifiable information for up to 7 years, in order to comply with the law, prevent fraud, assist with any investigation and enforce our Terms of Use.

We are not responsible for deleting or updating any information on third party sites.

### 9. COMMUNICATIONS AND PROMOTIONS.

By signing up to our Site, you agree to receive emails with promotional content related directed or indirectly to our services, including, for example, service suggestions and other news about products and services offered by us and our selected partners. If you no longer wish to receive such communications, you can opt-out through the link attached to each communication or by sending us an email to <a href="Legalstart@idc.ac.il">Legalstart@idc.ac.il</a>. We may still send you non-commercial emails which are necessary in order to provide you with the services that you requested.

## 10. CHANGES TO THIS PRIVACY POLICY.

This Policy may be updated from time to time. If we make any substantial changes, we may notify you by sending you an e-mail to the last e-mail address you provided, and/or by posting notice of the changes on our Site. Any changes will be effective upon the earlier of ten (10) calendar days following our email or ten (10) calendar days following our posting of notice on our Site. These changes will be effective immediately for new users of our Site. Continued use of our Site following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

# 11. ABUSE OF PRIVACY AND CONTACT INFORMATION.

We take your privacy seriously. If you have any concerns, please let us know.

We welcome your comments or questions. You may contact us at: Legalstart@idc.ac.il

Last Updated: March 2020