

NAVINA PRIVACY POLICY

Last Updated: June 15, 2020

In order to ensure transparency and give you more control over your personal information, this privacy policy (“**Privacy Policy**”) governs how we, **Navina Technologies Ltd.** (together, “**Navina**” “**we**”, “**our**” or “**us**”) use, collect and store personal data we collect or receive from or about you (“**you**”) such as in the following use cases:

- (i) When you browse or visit our website, <https://www.navina.ai/> (“**Website**”);
- (ii) When you make use of, or interact with, our Website
 - a. When you purchase (or otherwise obtain permission to use and/or access) our products and/or services
 - b. When you subscribe to our distribution list(s) / newsletter(s) / blog(s)
 - c. When we process your job application
 - d. When you contact us (e.g. customer support, need help, submit a request)
- (iii) When you attend a marketing event and provide us with your personal data
- (iv) When you exchange business cards with us
- (v) When we acquire your personal data from third-party sources (such as lead-generation companies)
- (vi) When we use the personal data of the end-users of our customers (e.g. contact details of patients of medical institutions and medical practitioners)
- (vii) When we use the personal data of our customers (e.g. contact details of medical institutions and medical practitioners)
- (viii) When we use the personal data of our service providers (e.g. contact details)
- (ix) When you interact with us on our social media profiles (e.g., Facebook, Instagram, Twitter, LinkedIn)

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest of user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to personal data. “**personal data**” or “**personal information**” means any information that can be used, alone or together with other data, to uniquely identify any living human being.

Important note: Nothing in this Privacy Policy is intended to limit in any way your statutory right, including your rights to a remedy or means of enforcement.

Table of contents:

1. What information we collect, why we collect it, and how it is used
2. How we protect and retain your personal data
3. How we share your personal data
4. Storage of personal data
5. Your privacy rights
6. Use by children
7. Interaction with third party products
8. Log files
9. Analytic tools
10. California privacy rights
11. Our California do not track notice
12. Specific provisions applicable under California privacy law
13. Contact us

This Privacy Policy can be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy. If we implement significant changes to the use of your personal data in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

1. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

Specific personal data we collect	Why is the personal data collected and for what purposes?	Third parties with whom we share your personal data	Consequences of not providing the personal data
<i>When you browse or visit our Website</i>			
Cookies, analytic tools and log files	<ul style="list-style-type: none"> • To better understand our website visitors • To improve how we present our content • To collect information about the Website • To improve the Website by measuring any errors that may occur 	3rd party platforms such as for the following purposes: <ul style="list-style-type: none"> • AWS- Cloud Hosting Services • Wix- website management and development services 	Cannot better understand our website visitors Cannot improve how we present our content Cannot collect information about the Website Cannot improve the Website by measuring any errors that may occur
<i>When you make use of, or interact with, our Website</i>			
<i>When you purchase (or otherwise obtain permission to use and/or access) our products and/or services</i>			
<ul style="list-style-type: none"> • Full name • Email address • Phone number • Company name • Title • Country • Purchase timeline • Any other data that you decide to provide/supply us with 	<ul style="list-style-type: none"> • To provide you with the products or services 	3rd party platforms such as for the following purposes: <ul style="list-style-type: none"> • AWS- Cloud Hosting Services • Wix- website management and development services 	Cannot provide you with the products or services

<ul style="list-style-type: none"> • Full name • Email address 	<ul style="list-style-type: none"> • To send you marketing communications 	3rd party platforms such as for the following purposes: <ul style="list-style-type: none"> • AWS- Cloud Hosting Services • Wix- website management and development services 	Cannot send you marketing communications Cannot sell your personal data
When you subscribe to our distribution list(s) / newsletter(s) / blog(s)			
<ul style="list-style-type: none"> • Email address 	<ul style="list-style-type: none"> • To add you to our mailing list • To send you marketing communications 	3rd party platforms such as for the following purposes: <ul style="list-style-type: none"> • AWS- Cloud Hosting Services • Wix- website management and development services 	Cannot add you to our mailing list Cannot send you marketing communications
When we process your job application			
<ul style="list-style-type: none"> • Full name • Email address • Address • CV • LinkedIn profile • Cover letter • Message • Any other data that you decide to provide/supply us with 	<ul style="list-style-type: none"> • To process your job application • To assess you as a candidate 	3rd party platforms such as for the following purposes: <ul style="list-style-type: none"> • AWS- Cloud Hosting Services • Wix- website management and development services 	Cannot process your job application Cannot assess your suitability as a candidate
When you contact us (e.g. customer support, need help, submit a request)			
<ul style="list-style-type: none"> • Full name • Email address • Company name • Phone number • Message / comments / request • Any other information that you decide to provide us 	<ul style="list-style-type: none"> • To process and answer questions • To provide support (e.g., to solve problems or issues) • To customize your experience 	3rd party platforms such as for the following purposes: <ul style="list-style-type: none"> • AWS- Cloud Hosting Services • Wix- website management and development services 	Cannot assist you and respond your query Cannot provide support Cannot customize your experience
When you attend a marketing event and provide us with your personal data			
<ul style="list-style-type: none"> • Full name • Company name • Title • Email address • Phone number • Any other data you decide to provide/supply 	<ul style="list-style-type: none"> • To establish a business connection • To send you marketing communications 	3rd party platforms such as for the following purposes: <ul style="list-style-type: none"> • AWS- Cloud Hosting Services • Wix- website management and development services 	Cannot establish a business connection Cannot send you marketing communications
When you exchange business cards with us			
<ul style="list-style-type: none"> • Full name • Company name • Email address • Phone number • Any other data you decide to provide/supply 	<ul style="list-style-type: none"> • To establish a business connection • To send you marketing communications 	3rd party platforms such as for the following purposes: <ul style="list-style-type: none"> • AWS- Cloud Hosting Services 	Cannot establish a business connection Cannot send you marketing communications

		<ul style="list-style-type: none"> Wix- website management and development services 	
When we acquire your personal data from third-party sources (such as lead-generation companies)			
<ul style="list-style-type: none"> Contact details 	<ul style="list-style-type: none"> To establish a business connection To send you marketing communications To generate insights on our marketing practices 	3rd party platforms such as for the following purposes: <ul style="list-style-type: none"> AWS- Cloud Hosting Services Wix- website management and development services 	<ul style="list-style-type: none"> Cannot establish a business connection Cannot send you marketing communications Cannot generate insights on our marketing practices
When we use the personal data of the end-users of our customers (e.g. contact details of patients of medical institutions and medical practitioners)			
<ul style="list-style-type: none"> Full name Email address Company name Address Title Contact Details Billing information Financial Information Demographic information Medical records Insurance information Any other data you decide to provide/supply us with 	<ul style="list-style-type: none"> To provide our products and services To perform our applicable service agreement To communicate with our customers/clients for contract-product related matters 	3rd party platforms such as for the following purposes: <ul style="list-style-type: none"> AWS- Cloud Hosting Services Wix- website management and development services 	<ul style="list-style-type: none"> Cannot provide the services and/or our products Cannot perform the agreement with you Cannot communicate with you
When we use the personal data of our customers (e.g. contact details of medical institutions and medical practitioners)			
<ul style="list-style-type: none"> Full name Company name Email address Phone number Billing information Financial Information Employee information Any other data you decide to provide/supply us with 	<ul style="list-style-type: none"> To contact our resellers, distributors, agents and/or finders To perform the applicable agreement To pay our resellers, distributors, agents and/or finders 	3rd party platforms such as for the following purposes: <ul style="list-style-type: none"> AWS- Cloud Hosting Services Wix- website management and development services 	<ul style="list-style-type: none"> Cannot contact our resellers, distributors, agents and/or finders Cannot perform the agreement Cannot pay our resellers, distributors, agents and/or finders
When we use the personal data of our service providers (e.g. contact details)			
<ul style="list-style-type: none"> Full name Company name Email address Phone number Billing information Any other data you decide to provide/supply us with 	<ul style="list-style-type: none"> To contact our providers To perform the applicable agreement To pay our service providers and suppliers 	3rd party platforms such as for the following purposes: <ul style="list-style-type: none"> AWS- Cloud Hosting Services Wix- website management and development services 	<ul style="list-style-type: none"> Cannot contact our service providers Cannot perform the agreement Cannot pay our service providers and suppliers
When you interact with us on our social media profiles (e.g., Facebook, Instagram, Twitter, LinkedIn)			
<ul style="list-style-type: none"> Full name Title Company Email address Any other data you decide to provide/supply us with 	<ul style="list-style-type: none"> To reply and/or respond to your request or question To establish a first business connection/discussion 	3rd party platforms such as for the following purposes: <ul style="list-style-type: none"> AWS- Cloud Hosting Services Wix- website management and development services 	<ul style="list-style-type: none"> Cannot reply or respond to your request Cannot establish a business connection

Finally, please note that some of the abovementioned personal data will be used for fraud detection and prevention, and for security purposes. The abovementioned personal data may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims. In certain cases, we may or will anonymize your personal data. “**Anonymous Information**” means information which does not enable identification of an individual user, such as aggregated information about the use of our services. We may use Anonymous Information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them).

2. HOW WE PROTECT AND RETAIN YOUR INFORMATION

- 2.1. **Security.** We have implemented appropriate technical, organizational and security measures designed to reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to such information appropriate to the nature of the information concerned. However, please note that we cannot guarantee that the information will not be exposed as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.
- 2.2. **Retention of Personal Data.** Your personal data will be stored until we no longer need the information and proactively delete it, or you send a valid deletion request. We reserve the right to retain any personal data, end user personal data we process on behalf of our customers and other service-related data for such time as we are providing services to the customer to which the information relates and for a reasonable time thereafter and to use information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. In addition to the retention mentioned above, in some circumstances we may store your personal data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your personal data or dealings. We have an internal data retention policy to ensure that we do not retain your personal data perpetually.

3. HOW WE SHARE YOUR PERSONAL DATA

In addition to the recipients described above, we may share your personal data as follows:

- 3.1. To the extent necessary, with regulators, courts or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- 3.2. If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your personal data to such third party (whether actual or potential) in connection with the foregoing events;
- 3.3. In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your personal data in connection with the foregoing events; and/or
- 3.4. Where you have provided your consent to us sharing or transferring your personal data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality).

4. STORAGE OF PERSONAL DATA

Storage: AWS – North Virginia – US

5. YOUR PRIVACY RIGHTS.

- 5.1. **Rights:** You may have certain rights under applicable privacy laws, such as accessing or correcting Personal Information. To the extent such privacy laws apply to you, we will respect your rights and comply with such laws.
- 5.2. The following rights (which may be subject to certain exemptions or derogations) may apply to certain individuals (some of which only apply to individuals protected by the CCPA, to the extent applicable):
 - o You have the right to know what personal information is being collected about you;
 - o You have the right to request the erasure/deletion of your personal data (e.g. from our records and the records of our service providers). Please note that there may be circumstances in which we are required to retain your personal data, for example for the establishment, exercise or defense of legal claims;
 - o You have the right to know whether your personal information is sold or disclosed and to whom;
 - o Restriction of, or object to, processing of your Personal Information, including the right to opt in or opt out of sale of your Personal Information to third parties, if applicable, where such requests are permitted by law;
 - o You have the right to equal service and price, even if you exercise your privacy rights;
 - o You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place of work or place of alleged infringement) at any time or before the relevant institutions in your place of residence (e.g. the Attorney General in your State). We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority and/or relevant institution.
- 5.3. You can exercise your rights by contacting us at privacy@navina.ai. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your requests. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

6. USE BY CHILDREN

We do not offer our products or services for use by children and, therefore, we do not knowingly collect personal data from, and/or about children under the age of eighteen (18). If you are under the age of eighteen (18), do not provide any personal data to us without involvement of a parent or a guardian. In the event that we become aware that you provide personal data in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at privacy@navina.ai.

7. INTERACTION WITH THIRD PARTY PRODUCTS

We enable you to interact with third party websites, mobile software applications and products or services that are not owned or controlled by us (each a “**Third Party Service**”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect personal data from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

8. LOG FILES

We use log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us. We use such information to analyze trends, administer the Website, track users’ movement around the Website, and gather demographic information.

9. ANALYTIC TOOLS

Our Website is powered by wix.com (“**Wix**”). Wix, together with its marketing and technology partners, uses certain monitoring and tracking technologies (such as cookies, pixels and tags). These technologies are used in order to maintain and improve Wix’s services on an ongoing basis, and in order to provide their users with a better experience. For example, thanks to these technologies, Wix is able to maintain and keep track of the preferences of its site visitors, to better secure Wix’s services,

to identify technical issues, user trends and effectiveness of campaigns, and to monitor and improve the overall performance of Wix's services. For more information, please visit Wix's privacy policy available at: <https://www.wix.com/about/privacy>.

We reserve the right to remove or add new analytic tools.

10. CALIFORNIA PRIVACY RIGHTS

California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to privacy@navina.ai. Please note that we will respond to one request per customer each year, unless otherwise required by law.

11. OUR CALIFORNIA DO NOT TRACK NOTICE

We do not track consumers over time and across third party websites and therefore do not respond to Do Not Track signals. We do not allow third parties to collect personally identifiable information about an individual consumer's online activities over time and across different web sites when a consumer uses the Services.

12. CONTACT US

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at privacy@navina.ai.
