

**Privacy Policy of the Coupon Wallet of the Click Coupon Online Company
(hereinafter: "the company")**

This Privacy Policy document is intended to share with you the data collected, used and shared by the company in the wallet, and to presents some other related aspects. This policy applies to all services and activities of the company and to the communication channels with you on the web, by phone, by regular and electronic mail, by text messages, in face-to-face conversations and more.

Some of the aspects described of this policy are also related to technical issues. We did our best to explain them in a simple and clear way.

If, after having read the policy, you find that it is discordant with your view or desires, you should refrain from using the company services and from providing the company with data related to you. It would not make us happy, but it is for you to decide and we will respect any such decision of yours.

For convenience purposes alone, the policy phrasing is in the masculine, but it refers to both genders.

For the purpose of this policy -

“**The company**” is Click Coupon Online as well as other companies which are held or would be held by it.

“**Data**” is data related to an individual (unlike that related to a company or any other corporation) and which identifies him / her, as defined in the Protection of Privacy Law, 1981.

We have prepared a summary of the policy in order to make it easier for you to be familiar with it and to easily understand the principles of the company use of data related to you. The summary does not constitute a substitute for the full policy.

Privacy Policy Summary

What is the Privacy Policy and what is it used for? This document describes the way in which the company collects and uses data related to you.

What data do we collect? We collect data required by us, for example, data provided by you, data related to your use of our services, data that exists in our systems and additional data from third parties.

How is data used by us? The data is used by us in order to provide you and the other customers of the company services and products, to develop new services, to cooperate with others in the provision of services, to protect the company and its customers, to contact you regarding your activity with us, for ongoing management and control purposes, and in order to send you marketing collateral.

What are your choices? We enable you to set your own preferences regarding our use of data related to you. For example, you may notify us, at any time, about your wish to stop receiving marketing collateral from us, to delete or block cooky files (Cookies), to update your personal details etc.

Whom do we share the data with? We share the data within the company and occasionally with suppliers, partners as well as with others, in order to realize the purposes of using data related to you in accordance with this policy.

How do we use statistical and unidentifiable data? We use statistical data and unidentifiable data for business purposes. For example, by creating statistical reports for inside uses.

Where is the data stored? The data collected by us is stored on our databases. We may store and process data on various sites around the world, including sites based on cloud technology.

How long is the data kept? We keep the data in accordance with our needs in order to supply our services, for our administrative needs and according to the law.

How do we modify the Privacy Policy? We will update you regarding modifications of our Privacy Policy.

How do we protect the data? We protect the data related to you in accordance with the strictest standards.

What about the privacy practices of third parties? This Privacy Policy concerns the activities of the company alone.

How does the policy fit with the Terms of Use? The Policy Privacy is an integral part of the Terms of Use of the company services.

Wish to talk? We are here for You. Send us an email – This is the easiest and most effective way.

What is the Privacy Policy and what is it used for?

The Privacy Policy describes the way in which the company collects and uses data related to you.

The Privacy Policy describes how we collect and use data related to you. That is why we recommend that you read it carefully.

This policy covers the data used in all your communication channels with the company, for example, on the web, on the phone, in regular and electronic mail, in text messages and in face-to-face conversations.

In addition, this policy also applies to all the data used in the framework of supplying the company services and its collaborations.

Some examples are: coupon storage, coupon transference, provision of marketing services and selling products, management and operational operations involved in providing services by the company and any additional activity of the company, with you, with its partners, suppliers and customers, that include data related to you. The company is committed to the highest standards of privacy protection and data security. We invest considerable resources and make our best efforts to protect and secure the data, in order to prevent unauthorized or illegal use of it.

What data is collected by us?

This policy describes the way in which we manage the data related to you in order to manage, provide and develop the services of the company and the wallet, and in order to ensure safe, available and convenient use of them.

We collect data as specified in this chapter.

This policy describes the way data related to you is being collected, used, shared and stored by us. You will be asked to supply us with some details, in accordance with law, so that we would be able to supply our services.

You are not obliged, in accordance with law, to provide us any additional data, however, in some cases, we will not be able to provide you with some of our services unless you do so.

We collect the following data:

Data provided by you. For example, in the process of your request to join as a wallet holder or when you contact us in writing or on the social networks, our websites and

other applications, we collect data such as: your name, address, the wallet service requested by you and their scope and the data related to the wallet as well as to your activity.

We also collect the data provided by you in your conversations with the customer service center and their recordings. For example, for the purposes of ongoing management, training, service improvement and control.

Another example of the details provided by you concerns processes in which verification of your identity is required.

Data related to your coupons use and to your wallet. For example, Your coupon usage history.

Data related to you, which was stored on the company databases. For example, data related to additional services that you, as well as other entities and individuals related to you, receive from us.

Data related to your use of our websites or application. For example when you:

- Sign up for our websites or app. During your registration to our website, you will be asked to supply details which may be used for identification purposes, such as: name and surname etc.

In order to provide you with additional services and benefits, you will be asked to supply additional data such as: consumption preferences, communication ways, including phone numbers and e-mail address.

- Participate in online programs offered by us, with our business partners, for example, customer clubs.
- Click on or view our publications or other web content, or contact us through social networks and other websites and applications.

Data related to your use of our services. For example:

- Technical data that allows us, among other things, to monitor and use tools to secure the data and improve the customer experience, to which we are committed.

Data related to your use of the digital channels (such as the website, the wallet and the app.), in the framework of our telephone service. Sometimes during such use, an automatic registration (usage log) of your activity takes place. Below are examples of the types of data we collect:

- **usage log (Log Data)** - Our servers automatically record data sent from the operation execution channel, for example from the browser, the website or the app.

This usage log includes the internet address protocol details (IP address) assigned to your device for web access, website address, browser details and settings, login time, the way the website was used by you and the cookies data

- **Cookies and trackers.** Cookies are small files that are saved on the device used by you when you surf the website. For example, in order to enhance the site performance, to record your login and logout and to identify your activities on the site as well as your preferences.

Some of the cookies are deleted when you close the browser while others are saved for a certain period of time on your device. You can watch the type of cookies used by us and their expiration dates in the settings of your browser.

We use different types of cookies, as well as tags and other trackers, for example in order to improve the site and its user experience.

The site also includes analysis tools operated by providers of the company that make use of cookies. For example: Google Analytics collects data regarding the use of the website. The use of data collected by Google for this purpose is subject to Google Privacy Policy (<https://policies.google.com/privacy?hl=iw&gl=il>). You may install a browser add-on in order to prevent the use of data related to you, such as Google Analytics Opt-Out Browser Add-on.

Oracle Eloqua used for management and marketing purposes. Oracle's use of data is subject to Oracle's Privacy Policy (<https://www.oracle.com/legal/privacy/services-privacy-policy.html>).

You may use a removal mechanism in order to prevent the collection of data related to you (<https://www.oracle.com/marketingcloud/opt-status.html>).

Data derived from the device used by you. In addition to the data log, we also collect data from your device. For example, the type of your device, the type of your browser and the web address (IP) used by your device in order to login.

Data about the location of operations performed by using the wallet or any other payment method or regarding services provided to you by us. For example, if you use the wallet in a certain city, such data will be recorded and used by us, for example, in order to provide you with helpful data relevant to your location.

We will use location data received from your device, such as satellite-based Global Positioning System data (GPS), cellular communication networks and short-range data transmission systems such as Bluetooth, subject to your consent.

Data related to you and to parties related to you, received from third parties.

We may receive data related to you from various sources, such as:

- Business partners
- Clearance and credit companies in Israel and abroad
- Affiliated International organizations
- Organizations that manage databases according to law
- Authorities, judicial bodies (for example courts and execution), the Population Registry and other authorized authorities such as the Bank of Israel.

Data put on the web. For example, data from other databases, classified directories and public databases, in accordance with the provisions of law.

How do we use the data?

We use the data to provide services and products to you and the other customers of the company, to develop new services, to cooperate with others in the provision of services, to protect the company and its customers, to contact you regarding your activity with us, for ongoing management and control and in order to send you marketing collateral in accordance with the law.

We collect and use data related to you for the following purposes:

- To examine your request to join one or more of our services, including by verifying your identity.
- To provide you with the services and to assist us in supplying the day-to-day activities involved in the management, control and security of the company services and systems, in making improvements and supplements to services and development, management and provision of additional services to the customers of the company.
- To enable us to send you reports and updates on a regular basis, regarding your use of the wallet and other services.
- To protect you, the services you receive and the company, and to detect attempts to misuse, fraud and embezzlement related to the company services, including through tracking and monitoring operations.
- To activate your wallet, to handle your inquiries etc.
- To manage risks and legal and administrative procedures as well as any other procedure before a competent authority, including debt repayment as specified in a judicial order. Data resulting from judicial orders or by virtue of legislative provisions related to execution, the tax ordinance (collection) or the regulations of the civil procedure, may assist us in risk management and decision-making, including regarding the limitation or termination of the provision of services.

- To offer you products and additional services provided or operated by us, personal benefits tailored for you, in accordance with the provisions of the law, newsletters, marketing collateral, as well as presenting you with aggregated and analytical data and additional data, in order to provide and improve the services we provide, and to offer you - through messages, inquiries, questionnaires, surveys and additional data - products, services and activities related to them. Notices delivered to you by various means (such as the website, mail, e-mail, call center, automatic dialing and text messages) may also include marketing collateral related to products and services.
- To provide services, for example, research and analysis services to businesses, to you and to other customers of the company, in connection with products and services purchased through or with the assistance of the company services, their use by the company customers and by others, and other activities related to the company services.
- To follow the stipulations of law or an authorized authorities, such as courts, tribunals, the Bank of Israel and the Israel Money Laundering and the Terror Financing Prohibition Authority.
- To generate statistical data as specified in this policy.
- To provide service to your proxy, according to your preferences. We can communicate with such proxy and enable the delivery of data and the performance of operations in accordance with our procedures.

What choices do you have? We offer you a number of options to set your own preferences regarding our use of data related to you. For example, you may notify us, at any time, about your wish to stop receiving marketing collateral from us, remove location-based services, cease the collection of data based on cookies and more. In addition, we enable you to review the data collected and to correct it in accordance with this policy and subject to the provisions of law.

Our goal is to clearly present the data we collect and allow a simple choice. Many choices are defined in the framework of the service itself. For example, you may:

- Manage the data related to you in the digital channels. Thus, for example, some of the data and personal details in the user's account related to you, can be edited and corrected. We will keep copies for control and documentation purposes, as required.
- Change your preferences regarding the web and other communication services, for example, remove yourself from location-based services and operations, or change your consent regarding the receipt, transmission and use of data by us. You can do that by calling 972-052-7510520. From time to time, we may offer you additional ways to change your preferences.
- Prevent the company and its suppliers from placing cookies on your device by the browser settings. You should take into account that such action may disrupt your ability to use the site, the wallet and the application.
- Reset the advertising ID on your phone, by using the settings area on your device. In this way, the connection between your actions recorded for advertising purposes according to your preferences, and your future actions will be cut off. Please note that the company has no control over the settings and selection options offered to you by the browser and the operating system on your phone.
- Notify us that you wish that we cease sending you marketing collateral (stopping of the notification service as part of using the application, can only be done by changing the settings in the application). We will cease sending you such messages in accordance with the provisions of law, within a reasonable period of time, in accordance with the operational limitations, after receiving such a message.
- Cancel your registration to the site and delete your user profile, by contacting the company by email (privacy@clickcoupononline.com). In case you have not logged in or your user's profile was not active for 6 months (or another period as shall be determined from time to time), you will be required to renew your verification process.

- View data related to you stored on the company databases and request their correction or the deletion of incorrect, incomplete, unclear or out of date details, in accordance with and subject to the provisions of law.

Whom do we share the data with?

As part of the current operation of the company, which is designed to provide you with quality service, we share data with companies inside and outside the company as well as cooperate with other organizations, in order to realize the purposes of using data related to you in accordance with this policy.

For example, we share data with other companies, businesses, international organizations, authorized by you in accordance with your permissions, other companies that supply services related to our services and companies that assist us in providing our services to you and to others.

We also share data with companies that help us realize our commitment to you and to the data related to you, such as data security and cyber companies.

We also share data with companies that help us protect your rights, the rights of other customers of the company, of the company itself and of its partners and suppliers, for example, the accountants and the legal advisors of the company group.

In addition, we share data with entities authorized by law to receive data from us as well as with other entities, subject to your consent, for example, as part of your becoming a customer of the company

We may share data with companies engaged in research, advertising and data analysis or our other customers for the purpose of developing new products, receiving tailored marketing collateral and providing services to the company customers.

If necessary, we will provide data to the enforcement authorities, investigative authorities and others, such as the National Cyber Security Center, the courts and other bodies, in the framework of legal and administrative procedures.

The delivery of the data to the authorities would be done in accordance with law and in a way that would protect your rights, those of other customers, and the interests of the company, of its business partners, its suppliers, other entities related to it, its functionaries and other individuals related to the company group.

How would modifications in the company structure affect the protection of my data?

Even if modifications in the company structure would take place in future, we continue to act according to this policy

In case our operations would be merged with those of another company, or the company would be purchased by another company, would modify its corporate structure, transfer or sell its operations or services, the new company would step into its shoes and use the data related to you in accordance with this policy.

How do we use statistical and unidentifiable data?

We use statistical and unidentifiable data for business purposes. Such analysis enables us, for example, to present you with data that is tailored and relevant to you and to a group of people who share similar characteristics.

In the digital age, many services rely on the use of statistical data and its processing. The uses are diverse and help, among other things, in generating business insights, data security, directing the organization efforts, and for development and innovation purposes.

Statistical and unidentifiable data is not subject to the privacy protection laws. We will collect, disclose and share this type of data for business and administrative purposes. When we use this type of data, we will not knowingly take any action that would reveal any identifiable data related to you.

Where is the data stored?

The data we collect is stored on our databases. We may store and process data on various sites around the world, including sites based on cloud technology.

The data we collect is saved and processed on our databases, which are stored on the computer systems of the company, as well as on hosting servers and data backup providers, which may also be located outside the borders of Israel.

The storage of the data is carried out in accordance with the customary standards, in order to protect the data and in accordance with the relevant regulation.

Additional data, as detailed in this policy, is collected and stored by other companies (such as data analysis and processing companies, data security, etc.). Such companies may also store the data outside the country borders.

The protection of privacy and the powers of the authorized authorities related to data access, related to you, may be different abroad from those in Israel. Your consent to this policy also constitutes a consent to the storage of the data abroad.

How long is the data kept?

We keep the data in accordance with our needs in order to supply our services, for our administrative needs and according to the law.

From time to time, modifications to this Privacy Policy may apply, resulting from modifications of law, regulations and regulatory guidelines, or modifications in the business setting, the nature and quality of the services provided by the company, technological modifications and more.

You would receive from us a notice about the expected modifications in the policy and their effective date. We will keep you updated re such changes, through the digital channels. There you would be able to reverify your consents if necessary.

Your continued use of the services, after the update to the Privacy Policy have been posted, indicates your acceptance of the updated policy. If you do not agree to the updated policy, you may terminate your use of the Services.

How do we protect the data related to you?

We secure the data related to you and protect it according to the strictest standards.

The company is committed to the highest standards of data security. We invest considerable resources and adapt the most advanced security and encryption methods, in order to ensure the protection of your privacy and the confidentiality of your data and to provide safe and secure use of the services of the company

What about the privacy practices of third parties?

This policy applies to the services of the company alone.

This policy concerns the services activity alone. The services may include references to applications, websites or other businesses, where the activity is not managed by us.

Accordingly, their privacy practices may be different from ours, and their use is subject to separate privacy policies.

How does the policy fit with the Terms of Use?

The Privacy Policy is an integral part of the Terms of Use of the company services and activities, and the agreements between you and the company.

Wish to talk?

If you believe your privacy has been violated, we apologize for that. We will be happy to be at your disposal and respond to your request as soon as possible.

You may contact to us at: privacy@clickcoupononline.com, or via your wallet.