

## **PRIVACY POLICY**

### **1. Introduction**

- 1.1. This Privacy Policy (together with the Terms of Use ("**Terms of Use**") and any other documents referred to on it, hereinafter the "**Policy**") informs you about the details of the processing of personal data you transmit, upload or otherwise make available during your use of the Site and the use of the Services ("**You**" or "**User**" and "**Services**", respectively) or which You provide Us through such use.
- 1.2. In this Policy, "**Leap 4**" or "**We**" or "**Us**" will mean Gefen Yuval Digital Ltd. If You are a user located in the European Economic Area ("**EEA**") or if you intend to transmit or upload data concerning EEA residents, please carefully note the information in this Policy on your rights under the 2016/679 EU General Data Protection Regulation ("**GDPR**").
- 1.3. Leap 4 recognizes the importance of keeping Your information secure and will ensure that the collection, use and sharing of Personal Information will be conducted in accordance with the terms of this Policy.
- 1.4. This Policy may be updated from time to time if and when our privacy practice changes; each version will apply to information collected while it was in place. You are advised to consult this Privacy Policy regularly for any changes.
- 1.5. In this Policy, anything that appears in a masculine form shall also mean the feminine form and vice versa.
- 1.6. All Capitalized terms used but not defined herein shall have the meanings given to such terms in the Terms of Use.

### **2. Information Collection and Use**

- 2.1. Leap 4 may collect, receive, retain and process the following information ("**Personal Information**"):
  - 2.1.1. Information that You provide Us to open an account to the Site or use the Services, which may include your first and last name, email address, username, password and your registration date;
  - 2.1.2. Technical information, such as your computer's IP address, operating system, the website from which you were linked to ours, the time and date of your visit, your searching history, the websites to which you were linked through the Site, and your activities in the Site;
  - 2.1.3. Information about the use of the Site and/or Services, such as how often users visit the Site, what pages they visit when they do so, and what other websites they used prior to coming to the Site (including by collection the IP address assigned to you on the date you visit the Site);
  - 2.1.4. Contact information such as full username, password, email address, city, telephone number, and other information that you decide to provide Leap 4 with;
  - 2.1.5. Your sessions recoding.
- 1.1. Leap 4 main objective in storing and processing Your Personal Information, as described in this Privacy Policy, is to provide You with access to our Site and to allow you to use our Services and to perform our contract with You. We may also process some of Your information to support and fulfil our legitimate business interests, such as self-study and internal statistics, and to allow Us to comply with legal and contractual obligations or defense against legal claims may use this information mainly to fulfill our contract with You.
- 1.2. In addition, Leap 4 may use the Personal Information collected in the following manners (We will

treat all the aforementioned and the following as "**Purpose**");

1.2.1. Recognize you when you return to use the Site.

For that reason, We also use cookies. Cookies are small text files that You load onto Your device when You use our Site and store the Personal Information. We use our own cookies in order to identify and recognize You when You return to use the Site and provide You with an easier automated login.

1.2.2. Estimate amount of users logging to the Site and usage pattern.

1.2.3. to provide you with the Services including any related features.

1.2.4. To conduct research and for further development of Leap 4 services in order to provide You with a better, more intuitive experience, including by way of development of new features.

1.2.5. Monitor the use of the Site and administrate the Site, for Leap 4 technical administration including for security reasons.

1.2.6. Charge you with the Fees in accordance with the Terms.

1.2.7. For troubleshooting purposes.

1.2.8. To market to you, and provide you with information about, the Site's products and services, including but not limited to the Site Service which is compatible with your interests.

1.3. Leap 4 stores the Personal Information while you are subscribing to the Services. Leap 4 may also store said information for a period of time after you no longer subscribed to the Services and using it if the information is necessary for the purposes for which it was collected or to satisfy legal requirements. These purposes typically include business, legal, or tax purposes.

1.4. All information provided by you or collected by Leap 4 is stored on Leap 4's secure servers. Unfortunately, the transmission of information via the internet is not completely secure. Although Leap 4 will make reasonable commercial effort to protect your personal data, Leap 4 cannot guarantee the complete security of your data transmitted to the Site and therefore any transmission is at your own risk. Once Leap 4 has received your information, Leap 4 will use strict procedures and security features to try to prevent unauthorized access.

## 2. Disclosure of information

2.1. Leap 4 may disclose your Personal Information to third parties or governmental authority, under the following obligations: Leap 4 is engaged with certain selected third parties which provide services to Leap 4, including, cellular or communication networks, hosting, database storage and maintenance and process services (such as Google Analytics). In addition, and in order to provide You with the Services, Leap 4 may be engaged with third parties who provide services similar that provided by the Leap 4 to You.

2.2. Leap 4 may share Your information with these third parties, but only to the extent necessary for the Purpose unless otherwise permitted by law, and only pursuant to binding contractual obligations requiring such third parties to maintain the privacy and security of Your information.

2.3. It is hereby clarified that some of the Personal Information collected and processed by these third parties is collected directly by them (and not transferred by us). We provide these third parties with access to the Site and Services and enable them to collect and use the Personal Information in order to provide You with excellent Services. In case You object to the process of any of these third parties of Your Personal Information, You can contact Us and ask Us to stop granting them with access to Your Personal Information. Please note that in such case some or all of the Services may not be available to You.

2.4. When We believe in good faith that disclosure is necessary to protect our rights, protect Your safety or the safety of others, investigate fraud, or respond to a government request (including court order, search warrant).

2.5. Leap 4 may disclose the Personal Information in the event where Leap 4 shall transfer in any way the operation of the Services to any third party and should it merged with another entity or merge the operations of the Services with the activity of a third party, provided that this corporation will assume the user to this Privacy Policy.

2.6. Leap 4 may disclose the Personal Information where You are performing any act in the Services which constitutes a violation of any law or the Terms of Use.

### 3. Security

The security of Your Personal Information is important to us. Leap 4 employs administrative, contractual, physical and electronic measures and security safeguards designed to protect Your information from unauthorized access. To protect the confidentiality of Personal Information, You must keep your password confidential and not disclose it to any other person. If other people have access to Your email, they may be able to obtain access to Your password and obtain personal information about You, or change information about Your user. However, Leap 4 cannot warrant the security of any information that You provide. There is no guarantee that data may not be accessed, disclosed, altered, or destroyed by breach of any of Leap 4 physical, technical, or managerial safeguards. If You have any questions about the security of the Services, You can contact Us as using the Contact Info detailed below.

### 4. Your Rights with respect to the Personal Information

4.1. Leap 4 offers You to control and manage the Personal Information Leap 4 has about You. You are entitled to ask Leap 4 to:

- Withdraw the consent – You may, at any time, withdraw your consent and no longer permit Leap 4 to use and keep Your Personal Information. Please note that by doing so, Your experience of the Services may be affected and You may not be able to use all or part of the Services that Leap 4 offers.
- Delete Data - You can ask Leap 4 to erase or delete all or some of the Personal Information (e.g., if it is no longer necessary to provide the Services).
- Change or Correct Data - You can ask Leap 4 to edit some of the Personal Information by asking Leap 4 to change, update or fix Your Personal Information in certain cases, particularly if it is inaccurate.
- Object to, or Limit or Restrict, Use of Personal Information - You can ask Leap 4 to stop using all or some of its Personal Information (e.g., if Leap 4 has no legal right to keep using it) or to limit Leap 4 use of it (e.g., if the Personal Information is inaccurate or unlawfully held).

Further, you have the right, for reasons arising from your particular situation, to object at any time to the processing of your personal data, which is processed on the basis our legitimate interests; this also applies to any profiling based on this processing. If you object, we will no longer process your personal data in the future unless we can prove compelling grounds for the processing that outweigh your interests, rights and freedoms or the processing serves to assert, exercise, or defend legal claims.

You also have the right to object at any point in time to the processing of your data for direct marketing purposes (i.e. receiving newsletters or other direct marketing communications). If you exercise your right to objection, we will no longer use your Personal Information for sending you any marketing communications.

- Right to Access and/or Take Your Data - You can ask Leap 4 for a copy of Personal Information and can ask for a copy of Personal Information You provided in machine readable form.

4.2. In case any of the foregoing actions is not available through Your account, You can contact Leap 4 at the Contact Info (as detailed below) and ask Us to perform it. You acknowledge that by asking Leap 4 to not store or process the Personal Information or by performing any of the foregoing actions on its own, You may prevent Us from providing You with the Services, and be prevented from using all or part of the Services. You hereby waive any claim or demand You might have against Leap 4 in this matter.

4.3. If You believe that the process of the Personal Information is not complying with the law applicable to You or Leap 4's response have not satisfied You, You may lodge a complaint to the relevant supervisory authority.

## 5. Lawful Bases for Processing

5.1. Leap 4 has lawful bases to collect, use and share data about each user of the Site. The primary lawful basis is based on the engagement of You with Us, in order for Leap 4 to provide You with the Services and to be able to contact You from time to time (where processing is necessary for the performance of a contract with You).

5.2. In addition, lawful bases include consent (where You have given consent), our legitimate interests and may also be a legal obligation to which We are subject.

5.3. In case there is more than one lawful bases for processing Personal Information, We may rely on any of the lawful bases even if the lawful basis is not explicitly stated in this Policy.

5.4. Where Leap 4 rely on Your consent to process Personal Information, You have the right to withdraw or decline consent at any time and where Leap 4 rely on legitimate interests, You have the right to object to the processing of Your Personal Information for reasons arising from Your particular situation. If You have any questions about the lawful bases upon which Leap 4 collects and use the Personal Information, please contact Us through the Contact Info.

5.5. At any time, You can withdraw the consent You have provided Us by contacting Us using the contact information detailed below.

## 6. Links to Other Sites

The Site may, from time to time, provide you with links to and from sites of advertisers and affiliates. Those links can be published on the Site by you, Leap 4 or third parties. These third party sites may collect information about you if you click on a link. The fact that Leap 4 links to a website does not constitute as an endorsement, authorization or representation of Leap 4 affiliation with that third party. Leap 4 do not exercise control over third party Sites. These other websites may place their own cookies or other files on your computer, collect data or solicit personally identifiable information from you. If you follow a link to any of these websites, you do so at your own risk, these sites have their own privacy policies and you are advised to review these policies before providing any personal data to these websites. You waive any claim against Leap 4 for any responsibility or liability for these policies.

## 7. Policy towards Children

The Service is not directed to children. By using the Site and/or the Service and approving the Terms of Use and this Policy, You also approve that You understand that the services provided are not intended for children under the age of 18 and addressed solely to a natural person who is at least 18 years old. We do not use the Services to knowingly solicit data from children under the age of 18. If a parent or guardian becomes aware that his or her child has provided Us with information without their consent, he or she should contact Us at the Contact Info provided below. We will delete such information from our files within a reasonable time.

## 8. Questions or Concerns

If You have any questions or concerns about this Policy or would like to contact Us for any reason, You can e-mail Us at [privacy@leap4.media](mailto:privacy@leap4.media) (the "Contact Info").