

**WALABOT WEBSITE  
DIY & MAKERS PRIVACY POLICY**

*Last Updated: June 6, 2022*

In order to ensure transparency and give you more control over your Personal Data, this privacy policy (“**Privacy Policy**”) governs how we, Vayyar Imaging Ltd. (together, “**Walabot**”, “**Vayyar**”, “**we**”, “**our**” or “**us**”) use, collect and store Personal Data we collect or receive from or about you (“**you**”) in connection with the use of the website [walabot.com](https://walabot.com), together with its sub-domains (the “**Site**”), such as in the following use cases:

- (i) **When you browse or visit our Site**
- (ii) **When you make use of, or interact with, our Site**
  - a. When you complete a form to be a Walabot distributor or reseller
  - b. When you are a University researcher and complete a form for research purposes
  - c. When you complete a form to return a product
  - d. When you contact us (e.g. customer support, help, submit a request)
  - e. When you subscribe to our email list
- (iii) **When you make use of, or interact with, our subdomain <https://shop.walabot.com> (“Site Store”)**
  - a. When you purchase a product in our Site Store
  - b. When you track an order
  - c. When you make reviews or publish a question
  - d. When you subscribe to our email list
  - e. When you subscribe to receive updates regarding the iOS
  - f. When you subscribe to obtain a discount
- (iv) **When you make use of, or interact with, our subdomain <https://walabot.com/diy> (“DIY Site”)**
  - a. When you make reviews
  - b. When you subscribe to our email list
- (v) **When you make use of, or interact with, our subdomain <https://walabot.com/makers> (“Makers Site”)**
  - a. When you contact us to be a Maker partner
  - b. When you make use of the Walabot API guidance and/or tutorials to better understand how to use our API (<https://api.walabot.com/>)
  - c. When you decide to get started and download a Walabot SDK (e.g., Windows SDK, Linux SDK, RaspberryPi 3)
  - d. When you subscribe to the email list

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. Please note that this is a master privacy policy and some of its provisions only apply to certain individuals in certain jurisdictions, and may not apply to you.

**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

<b>1. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED.</b>	<b>3</b>
When you make use of, or interact with, our Site	3
When you complete a form to be a Walabot distributor or reseller on our Site	3
When you are an University researcher and complete a form for research purposes on our Site	3
When you complete a form to return a product on our Site	3
When you contact us (e.g. customer support, help, submit a request) on our Site	3
When you subscribe to our email list on our Site	4
When you make use of, or interact with, our Site Store	4
When you purchase a product in our Site Store	4
When you track an order on our Site Store	4
When you make review or publish a question on our Site Store	5
When you subscribe to the email list on our Site Store	5
When you subscribe to receive updates regarding iOS on our Site Store	5
When you subscribe to obtain a discount on our Site Store	5
When you make use of, or interact with, our DIY Site	5
When you make reviews on our DIY Site	5
When you subscribe to our email list on our DIY Site	6
When you make use of, or interact with, our Maker Site	6
When you contact us to be a Maker partner	6
When you make use of the Walabot API guidance and/or tutorials to better understand how to use our API	6
When you decide to get started and download a Walabot SDK (e.g., Windows SDK, Linux SDK, RaspberryPi 3)	6
When you subscribe to the email list	7
<b>2. PERIOD OF STORAGE OF COLLECTED PERSONAL DATA</b>	<b>7</b>
<b>3. HOW WE PROTECT AND RETAIN YOUR PERSONAL DATA</b>	<b>7</b>
<b>4. HOW WE SHARE YOUR PERSONAL DATA</b>	<b>7</b>
<b>5. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL DATA</b>	<b>7</b>
<b>6. YOUR PRIVACY RIGHTS</b>	<b>8</b>
<b>7. USE BY CHILDREN</b>	<b>8</b>
<b>8. INTERACTION WITH THIRD PARTY PRODUCTS</b>	<b>8</b>
<b>9. LOG FILES</b>	<b>8</b>
<b>10. ANALYTIC TOOLS</b>	<b>8</b>
<b>11. SPECIFIC PROVISIONS APPLICABLE UNDER CALIFORNIA PRIVACY LAW</b>	<b>9</b>
<b>12. CONTACT US</b>	<b>9</b>

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 Site 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?	Legal basis (GDPR only, if applicable)	Third parties with whom we share your Personal Data	Consequences of not providing the Personal Data
<b>When you browse or visit our Site</b>				
<p>Cookies, pixels, analytic tools and log files</p> <p>For more information, please read our cookies policy <a href="http://walabot.com/cookie-consent">http://walabot.com/cookie-consent</a></p>	<p>Marketing, analytics, analysis, market research, to improve our Site</p>	<p>Consent</p> <p>Legitimate interest (e.g. essential cookies)</p>	<p>3rd party platforms such as:</p> <ul style="list-style-type: none"> <li>• Google analytics</li> <li>• Hotjar</li> <li>• Zendesk</li> <li>• Wufoo</li> <li>• Mailchimp</li> <li>• Bing (Microsoft)</li> <li>• Facebook</li> <li>• Google ads</li> <li>• Taboola</li> <li>• BazaarVoice</li> <li>• Pinterest</li> <li>• Google AdSense</li> <li>• LinkedIn (Microsoft)</li> <li>• Salesforce</li> <li>• Funnel.io</li> <li>• TikTok</li> </ul>	<p>Cannot collect and store the information</p> <p>Cannot use or access some parts of the Site</p>
<b>When you make use of, or interact with, our Site</b>				
<b>When you complete a form to be a Walabot distributor or reseller on our Site</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Company name</li> <li>• Distributor type</li> <li>• Type of product</li> <li>• Website</li> <li>• Comments</li> <li>• Any other information that you decide to provide/supply us with.</li> </ul>	<ul style="list-style-type: none"> <li>• To process your form</li> <li>• To assess you as a distributor or reseller</li> <li>• To contact you to have further discussions with respect to the form that you decided to complete</li> </ul>	<p>Processing is necessary for the performance of a contract with the data subject or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g., to assess you as a distributor or reseller)</p>	<p>3rd party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> <li>• Wufoo (Form management tool)</li> <li>• AWS (Storage – for backup)</li> <li>• Salesforce (CRM)</li> </ul>	<p>Cannot process your form</p> <p>Cannot assess you as a distributor or reseller</p> <p>Cannot contact you to have further discussions with respect to the form that you decided to complete</p>
<b>When you are an University researcher and complete a form for research purposes on our Site</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Company name</li> <li>• Comments and inquiry</li> <li>• Any other information that you decide to provide/supply us with</li> </ul>	<ul style="list-style-type: none"> <li>• To process your form</li> <li>• To assess you as a suitable university for research purposes</li> <li>• To contact you to have further discussions with respect to the form that you decided to complete</li> </ul>	<p>Processing is necessary for the performance of a contract with the data subject or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g., to assess you as a suitable university for research purposes)</p>	<p>3<sup>rd</sup> party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> <li>• Wufoo (Form management tool)</li> <li>• AWS (Storage – for backup)</li> <li>• Salesforce (CRM)</li> </ul>	<p>Cannot process your form</p> <p>Cannot assess you as a suitable university for research purposes</p> <p>Cannot contact you to have further discussions with respect to the form that you decided to complete</p>
<b>When you complete a form to return a product on our Site</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Shipping address</li> <li>• Email address</li> <li>• Order Id</li> <li>• Reasons for the return</li> <li>• Any other information that you decide to provide/supply us with</li> </ul>	<ul style="list-style-type: none"> <li>• To process your form</li> <li>• To analyze your request to return a product</li> <li>• To contact you for the purpose of assisting you with respect to the return of the product</li> </ul>	<p>Processing is necessary for the performance of a contract with the data subject or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g., to analyze your request to return a product)</p>	<p>3<sup>rd</sup> party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> <li>• Wufoo (Form management tool)</li> <li>• AWS (Storage – for backup)</li> </ul>	<p>Cannot process your form</p> <p>Cannot analyze your request to return a product</p> <p>Cannot contact you for the purpose of assist you with respect to the return of the product or tracking your order</p>
<b>When you contact us (e.g. customer support, help, submit a request) on our Site</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Attachments</li> </ul>	<ul style="list-style-type: none"> <li>• To process and answer your questions</li> </ul>	<p>Processing is necessary for the performance of a contract with the data</p>	<p>3<sup>rd</sup> party platforms such as for the following purposes:</p>	<p>Cannot process and answer your questions</p>

<ul style="list-style-type: none"> <li>Comments and messages</li> <li>Any other information that you decide to provide/supply us with</li> </ul>	<ul style="list-style-type: none"> <li>To provide support (e.g., to solve problems, bugs or issues)</li> <li>To customize your experience</li> </ul>	<p>subject or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g., to process and answer your questions)</p>	<ul style="list-style-type: none"> <li>AWS (Storage – for backup)</li> <li>Zendesk (Chat tool &amp; CRM)</li> </ul>	<p>Cannot provide support</p> <p>Cannot customize your experience</p>
<b>When you subscribe to our email list on our Site</b>				
<ul style="list-style-type: none"> <li>Email address</li> </ul>	<ul style="list-style-type: none"> <li>To send you marketing communications</li> </ul>	<p>Consent</p>	<p>3<sup>rd</sup> party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> <li>Mailchimp - form and email management tool</li> <li>AWS - Storage – for backup</li> <li>Funnel.io</li> </ul>	<p>Cannot send you marketing communications</p>
<b>When you make use of, or interact with, our Site Store</b>				
<p>Cookies, pixels, analytic tools and log files</p> <p>For more information, please read our cookies policy <a href="http://walabot.com/cookie-consent">http://walabot.com/cookie-consent</a></p>	<p>Marketing, analytics, analysis, market research, to improve our Site</p>	<p>Consent</p> <p>Legitimate interest (e.g. essential cookies)</p>	<p>3<sup>rd</sup> party platforms such as:</p> <ul style="list-style-type: none"> <li>Google analytics</li> <li>Hotjar</li> <li>Zendesk</li> <li>Wufoo</li> <li>Mailchimp</li> <li>Bing (Microsoft)</li> <li>Facebook</li> <li>Google ads</li> <li>Taboola</li> <li>BazaarVoice</li> <li>Pinterest</li> <li>Google AdSense</li> <li>LinkedIn (Microsoft)</li> <li>Salesforce</li> <li>Funnel.io</li> <li>TikTok</li> </ul>	<p>Cannot collect and store the information</p> <p>Cannot use or access some parts of the Site</p>
<b>When you purchase a product in our Site Store</b>				
<ul style="list-style-type: none"> <li>Shipping address (including, address, region, state or province, city, zip/Postal Code)</li> <li>Email Address</li> <li>Full name</li> <li>Company name</li> <li>Phone Number</li> <li>Shipping method</li> <li>Payment method and details</li> <li>Order Id</li> <li>IP address and geo location(country and city)</li> <li>Any other information that you decide to provide/supply us with</li> </ul>	<ul style="list-style-type: none"> <li>To allow you to purchase our products</li> <li>To process the order of your purchase</li> <li>To ship your product</li> <li>To perform/execute the agreement</li> <li>To send you related communications to your order, the shipment and other relevant details</li> </ul>	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g., to process the order of the purchase)</p>	<p>3<sup>rd</sup> party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> <li>Shopify (e-commerce platform and other marketing tools)</li> <li>Magento (e-commerce platform and other marketing tools)</li> <li>Aero/DSL (Shipping)</li> <li>Paypal (Payment processor)</li> <li>Bluesnap (Payment processor)</li> <li>Avalara (Tax processor)</li> <li>Google Pay (Payment processor)</li> <li>Apple Pay (Payment processor)</li> <li>Funnel.io (analytics)</li> <li>Google Analytics</li> </ul>	<p>Cannot allow you to purchase our products</p> <p>Cannot process the order of your purchase</p> <p>Cannot ship your product</p> <p>Cannot perform/execute the agreement</p> <p>Cannot send you related communications to your order, the shipment and other relevant details</p>
<b>When you track an order on our Site Store</b>				
<ul style="list-style-type: none"> <li>Email address</li> <li>Order Id</li> <li>Any other information that you decide to provide/supply us with</li> </ul>	<ul style="list-style-type: none"> <li>To help you to track your order</li> <li>To assist you with the shipping method selected by you</li> </ul>	<p>Processing is necessary for the performance of a contract with the data subject or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest</p>	<p>3<sup>rd</sup> party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> <li>Aftership (package tracking tool)</li> <li>Trackingmore (package tracking tool)</li> </ul>	<p>Cannot help you to track your order</p> <p>Cannot proactively track your order and ensure it has been fulfilled</p> <p>Cannot ship the order</p>

		(e.g., to help you to track your order)	<ul style="list-style-type: none"> <li>• AERO (ships the order on our behalf)</li> <li>• Funnel.io</li> </ul>	
<b>When you make review or publish a question on our Site Store</b>				
<ul style="list-style-type: none"> <li>• Nick name</li> <li>• Review, questions and comments</li> <li>• Any other information that you provide/supply us with, such as if you are happy with the purchase and product(s)</li> </ul>	<ul style="list-style-type: none"> <li>• To invite you to write a review of the purchased products</li> <li>• To allow you to publish questions of the products</li> <li>• To process and analyze your answers</li> <li>• To customize your experience</li> </ul>	Legitimate interest (e.g. to respond your questions)	3 <sup>rd</sup> party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>• Bazaar Voice – a reviews management platform</li> </ul>	Cannot invite you to write a review of the purchased products  Cannot allow you to publish questions of the products  Cannot process and analyze your answers  Cannot customize your experience
<b>When you subscribe to the email list on our Site Store</b>				
<ul style="list-style-type: none"> <li>• Email address</li> </ul>	<ul style="list-style-type: none"> <li>• To send you marketing communications</li> </ul>	Consent	3 <sup>rd</sup> party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>• Mailchimp form and Emails management tool</li> <li>• AWS - Storage – for backup</li> <li>• Funnel.io</li> </ul>	Cannot send you marketing communications
<b>When you subscribe to receive updates regarding iOS on our Site Store</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> </ul>	<ul style="list-style-type: none"> <li>• To send you updates and communications</li> <li>• To let you know when the iOS version will be available</li> </ul>	Consent  Legitimate interest (e.g. to allow you to register to receive the updates)	3 <sup>rd</sup> party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>• Mailchimp form and emails management tool</li> <li>• AWS Storage – for backup</li> <li>• Funnel.io</li> </ul>	Cannot send you marketing communications
<b>When you subscribe to obtain a discount on our Site Store</b>				
<ul style="list-style-type: none"> <li>• Email address</li> </ul>	<ul style="list-style-type: none"> <li>• To allow you to obtain discounts</li> <li>• To send you an email with the discount</li> </ul>	Consent  Legitimate interest (e.g. to allow you to subscribe to obtain discounts)	3 <sup>rd</sup> party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>• Mailchimp - form and emails management tool</li> <li>• AWS - Storage – for backup</li> <li>• Funnel.io</li> </ul>	Cannot send you marketing communications
<b>When you make use of, or interact with, our DIY Site</b>				
Cookies, pixels, analytic tools and log files  For more information, please read our cookies policy <a href="http://walabot.com/cookie-consent">http://walabot.com/cookie-consent</a>	Marketing, analytics, analysis, market research, to improve our Site	Consent  Legitimate interest (e.g. essential cookies)	3 <sup>rd</sup> party platforms such as: <ul style="list-style-type: none"> <li>• Google analytics</li> <li>• Hotjar</li> <li>• Zendesk</li> <li>• Wufoo</li> <li>• Mailchimp</li> <li>• Bing (Microsoft)</li> <li>• Facebook</li> <li>• Google ads</li> <li>• Taboola</li> <li>• BazaarVoice</li> <li>• Pinterest</li> <li>• Google AdSense</li> <li>• LinkedIn (Microsoft)</li> <li>• Salesforce</li> <li>• Funnel.io</li> <li>• TikTok</li> </ul>	Cannot collect and store the information  Cannot use or access some parts of the Site
<b>When you make reviews on our DIY Site</b>				
<ul style="list-style-type: none"> <li>• Nickname – full name</li> <li>• Email address</li> <li>• Location</li> <li>• Device type</li> <li>• IP address</li> </ul>	<ul style="list-style-type: none"> <li>• To process your review and publish it in our Site(s) and social media channels</li> </ul>	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request	3 <sup>rd</sup> party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>• BazaarVoice (review)</li> </ul>	Cannot process your review and publish it in our Site(s) and social media channels

<ul style="list-style-type: none"> <li>Title of the review and the review/comments</li> <li>Any other information that you decide to provide/supply us with</li> </ul>	<ul style="list-style-type: none"> <li>To process and analyze your answers</li> <li>To improve our services</li> </ul>	<p>of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g., to process your review)</p>	<p>management platform)</p> <ul style="list-style-type: none"> <li>Funnel.io</li> </ul>	<p>Cannot process and analyze your answers</p> <p>Cannot improve your services</p>
<b>When you subscribe to our email list on our DIY Site</b>				
<ul style="list-style-type: none"> <li>Email address</li> <li>Area of expertise</li> </ul>	<ul style="list-style-type: none"> <li>To send you marketing communications</li> </ul>	<p>Consent</p>	<p>3<sup>rd</sup> party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> <li>AWS – Storage and for backup</li> <li>Mailchimp - form and emails management tool</li> <li>Funnel.io</li> </ul>	<p>Cannot send you marketing communications</p>
<b>When you make use of, or interact with, our Maker Site</b>				
<p>Cookies, pixels, analytic tools and log files</p> <p>For more information, please read our cookies policy <a href="http://walabot.com/cookie-consent">http://walabot.com/cookie-consent</a></p>	<p>Marketing, analytics, analysis, market research, to improve our Maker Site</p>	<p>Consent</p> <p>Legitimate interest (e.g. essential cookies)</p>	<p>3rd party platforms such as:</p> <ul style="list-style-type: none"> <li>Google analytics</li> <li>Hotjar</li> <li>Zendesk</li> <li>Wufoo</li> <li>Mailchimp</li> <li>Bing (Microsoft)</li> <li>Facebook</li> <li>Google ads</li> <li>Taboola</li> <li>BazaarVoice</li> <li>Pinterest</li> <li>Google AdSense</li> <li>LinkedIn (Microsoft)</li> <li>Salesforce</li> <li>Funnel.io</li> <li>TikTok</li> </ul>	<p>Cannot collect and store the information</p> <p>Cannot use or access some parts of the Site</p>
<b>When you contact us to be a Maker partner</b>				
<ul style="list-style-type: none"> <li>Full name</li> <li>Email address</li> <li>Company/organization name</li> <li>Type of partner</li> <li>Country</li> <li>Comments</li> <li>Any other information that you decide to provide/supply us with</li> </ul>	<ul style="list-style-type: none"> <li>To process your form</li> <li>To assess you as a partner</li> <li>To contact you to have further discussions with respect to the form that you decided to complete</li> </ul>	<p>Processing is necessary for the performance of a contract with the data subject or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g., to assess you as a distributor or reseller)</p>	<p>3rd party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> <li>Wufoo (Form management tool)</li> <li>AWS (Storage – for backup)</li> <li>Salesforce (CRM)</li> </ul>	<p>Cannot process your form</p> <p>Cannot assess you as a distributor or reseller</p> <p>Cannot contact you to have further discussions with respect to the form that you decided to complete</p>
<b>When you make use of the Walabot API guidance and/or tutorials to better understand how to use our API</b>				
<p>Cookies, pixels, analytic tools and log files</p> <p>For more information, please read our cookies policy <a href="http://walabot.com/cookie-consent">http://walabot.com/cookie-consent</a></p>	<p>Marketing, analytics, analysis, market research, to improve our Site</p>	<p>Consent</p> <p>Legitimate interest (e.g. essential cookies)</p>	<p>3rd party platforms such as:</p> <ul style="list-style-type: none"> <li>Google analytics</li> <li>Hotjar</li> <li>Zendesk</li> <li>Wufoo</li> <li>Mailchimp</li> <li>Bing (Microsoft)</li> <li>Facebook</li> <li>Google ads</li> <li>Taboola</li> <li>BazaarVoice</li> <li>Pinterest</li> <li>Google AdSense</li> <li>LinkedIn (Microsoft)</li> <li>Salesforce</li> <li>Funnel.io</li> <li>TikTok</li> </ul>	<p>Cannot collect and store the information</p> <p>Cannot use or access some parts of the Site</p>
<b>When you decide to get started and download a Walabot SDK (e.g., Windows SDK, Linux SDK, RaspberryPi 3)</b>				

<ul style="list-style-type: none"> <li>Details of the Walabot SDK downloaded</li> </ul>	<ul style="list-style-type: none"> <li>To allow you to download a Walabot SDK</li> </ul>	<p>Processing is necessary for the performance of a contract with the data subject or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g., to enable customers to download the servers)</p>	<p>3<sup>rd</sup> party platforms such as for the following purposes:</p> <p>Cookies. For more information, read our cookie policy <a href="http://walabot.com/cookie-consent">http://walabot.com/cookie-consent</a></p>	<p>Cannot allow you to download a Walabot SDK</p>
<p><b><i>When you subscribe to the email list</i></b></p>				
<ul style="list-style-type: none"> <li>Email address</li> </ul>	<ul style="list-style-type: none"> <li>To send you marketing communications</li> </ul>	<p>Consent</p>	<p>3<sup>rd</sup> party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> <li>Mailchimp - form and emails management tool</li> <li>AWS – Storage and backup</li> <li>Funnel.io</li> </ul>	<p>Cannot send you marketing communications</p>

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 will 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, if necessary. In certain cases, we 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. PERIOD OF STORAGE OF COLLECTED PERSONAL DATA

Personal Data. Your Personal Data (as described above) will be stored until we no longer need the information and proactively deleted or you send a valid deletion request. Please note that we will retain it for a longer or shorter period in accordance with data retention laws. We have an internal data retention policy to ensure that we do not retain your Personal Data perpetually.

## 3. HOW WE PROTECT AND RETAIN YOUR PERSONAL DATA

3.1. Security. We have implemented appropriate technical, organizational and security measures designed to protect your Personal Data. However, please note that we cannot guarantee that the information will not be compromised 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.

3.2. Retention of your Personal Data. In addition to the retention periods mentioned above, in some circumstances we will 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. Regarding retention of cookies, you can read more in our cookie policy <http://walabot.com/cookie-consent>.

## 4. HOW WE SHARE YOUR PERSONAL DATA

In addition to the recipients described above, if necessary, we will share your Personal Data as follows:

- 4.1. With our business partners with whom we jointly offer products or services. We will also share Personal Data with our affiliated companies.
- 4.2. 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;
- 4.3. 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;
- 4.4. 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
- 4.5. 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).

If you want to receive the list of the current recipients of your Personal Data, please make your request by contacting us to [privacy@walabot.com](mailto:privacy@walabot.com).

## 5. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL DATA

5.1. Storage: Microsoft Azure, Google Cloud, and AWS.

5.2. Access from Israel: Access from Israel is covered by the European Commission’s Adequacy Decision regarding Israel. You can read more here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en).

5.3. Internal transfers: Transfers within the Vayyar group will be covered by an internal processing agreement entered into by members of the Vayyar group (an intra-group agreement) which contractually obliges each member to ensure that Personal Data receives an adequate and consistent level of protection wherever it is transferred to.

5.4. **External transfers:** Where we transfer your Personal Data outside of EU/EEA (for example to third parties who provide us with services), we will obtain contractual commitments from them to protect your Personal Data. For more information about transfers please contact us at: [privacy@walabot.com](mailto:privacy@walabot.com).

## 6. YOUR PRIVACY RIGHTS

6.1. **Rights:** The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by the GDPR):

- You have a right to access Personal Data held about you. Your right of access may normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
- You have the right to request that we rectify any Personal Data we hold that is inaccurate or misleading;
- You have the right to request the erasure/deletion of your Personal Data (e.g. from our records). 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;
- You have the right to object, to or to request restriction, of the processing;
- You have the right to data portability. This means that you may have the right to receive your Personal Data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
- You have the right to object to profiling;
- You have the right to withdraw your consent at any time. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations. Also, please note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal;
- You also have a right to request certain details of the basis on which your Personal Data is transferred outside the European Economic Area, but data transfer agreements and/or other details may need to be partially redacted for reasons of commercial confidentiality;
- 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. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority and/or relevant institution.

## 7. 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. For the purposes of the GDPR, we do not intend to *offer information society services directly to children*. 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@walabot.com](mailto:privacy@walabot.com).

## 8. 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.

## 9. LOG FILES

We use log files. The information inside the log files include 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 Site, track users’ movement around the Site, and gather demographic information.

## 10. ANALYTIC TOOLS

- **Firebase Analytics.** We also use “**Google Analytics for Firebase**”. By enabling this tool, we enable the collection of data about App Users, including via identifiers for mobile devices (including Android Advertising ID and Advertising Identifier for iOS), cookies and similar technologies. We use the information we get from Google Analytics for Firebase to maintain and improve our App(s). We do not facilitate the merging of personally-identifiable information with non-personally identifiable information unless we have robust notice of, and your prior affirmative (i.e., opt-in) consent to, that merger. Finally, please note that Google Analytics for Firebase’s terms (available at <https://firebase.google.com/terms/>) shall also apply.
- **Facebook Custom Audience.** We provide Facebook certain data about users. Facebook does not disclose to us which individual user comprises our Audience (as defined in the Custom Audience [terms](#)). Our use of this tool is subject to the following terms: <https://www.facebook.com/legal/terms/customaudience>. You may opt out of this tool according to the instructions available at: <https://www.facebook.com/ads/settings>.
- **Google Ads Similar Audience.** We use this tool in order to personalize our ads. Google uses cookies and/or device identifiers to serve ads based your past visits to our Site and/or apps, on our behalf. You can opt out of Google's use of cookies or device identifiers by visiting Google's [Ads Settings](#). Alternatively, opt out of a third-party vendor's use of cookies by visiting the [Network Advertising Initiative opt-out page](#) or control the use of device identifiers by using your [device's settings](#).
- **Advertising Partners.** Through our services, we allow third party advertising partners to set technologies and other tracking tools to collect information regarding your activities and your device (e.g., your IP address, mobile identifiers, page(s) visited, location, time of day). We also combine and share such information and other information (such as demographic information and past purchase history) with third party advertising partners. These advertising partners will use this information (and similar information collected from other websites) for purposes of delivering targeted advertisements to you when you visit third party websites within their networks. This practice is commonly referred to as “interest-based advertising” or “online behavioral advertising. We allow access to other data collected by the services to share information that may be useful, relevant, valuable or otherwise of interest to you. If you prefer not to share your Personal Information with third party advertising partners, you may let us know.



- **Google Analytics.** The Site uses a tool called “**Google Analytics**” to collect information about use of the Site. Google Analytics collects information such as how often users visit this Site, what pages they visit when they do so, and what other websites they used prior to coming to this Site. We use the information we get from Google Analytics to maintain and improve the Site and our products. We do not combine the information collected through the use of Google Analytics with personal information. Google’s ability to use and share information collected by Google Analytics about your visits to this Site is restricted by the Google Analytics Terms of Service, available at <http://www.google.com/analytics/terms/us.html/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.
- **Hotjar.** The Site uses Hotjar in order to better understand our users’ needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don’t like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users’ behavior and their devices (in particular device's IP address (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display our Site). Hotjar stores this information in a pseudonymized user profile. Neither Hotjar nor we will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar’s privacy policy at <https://www.hotjar.com/legal/policies/privacy>. You can opt-out to the creation of a user profile, Hotjar’s storing of data about your usage of our Website and Hotjar’s use of tracking cookies on other websites on this link <https://www.hotjar.com/legal/compliance/opt-out>.
- **Facebook Pixels and SDKs.** We use Facebook pixels or SDKs, which are tools that provide help to us to integrate, use and exchange information with Facebook, as such the collection and use of information for ad targeting. Please note that third parties, including Facebook, use cookies, web beacons, and other storage technologies to collect or receive information from websites you visit and elsewhere on the internet and use that information to provide measurement services and target ads. Facebook’s ability to use and share information is governed by the Facebook Business Tools Terms, available at: [https://www.facebook.com/legal/technology\\_terms/](https://www.facebook.com/legal/technology_terms/). You can prevent your data from being used by Facebook Pixels and SDKs by exercising your choice through these mechanisms: <http://www.aboutads.info/choices> or <http://www.youronlinechoices.eu/>.
- **Facebook Conversion API.** We use Facebook Conversion API in order to match the contact information against user IDs (“**Matched User IDs**”), as well as to combine those user IDs with corresponding event data (which is information about the your use of our website and app). We use Facebook Conversion API in order to receive reports, generate analytics and insights about people and their use of our Site Store, to improve ad targeting and delivery optimization of our ad campaigns in relation to the Site Store. You can prevent your data from being used by Facebook Conversion API by exercising your choice through these mechanisms: <http://www.aboutads.info/> choices or <http://www.youronlinechoices.eu/>.

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

## 11. SPECIFIC PROVISIONS APPLICABLE UNDER CALIFORNIA PRIVACY LAW

- 1.1. **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@walabot.com](mailto:privacy@walabot.com). Please note that we will respond to one request per customer each year, unless otherwise required by law.
- 1.2. **Our California Do Not Track Notice:** We do not currently respond or take any action with respect to web browser “do not track” signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personally identifiable information about an individual consumer’s online activities over time and across third-party web sites or online services. We may allow third parties, such as companies that provide us with analytics tools, 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.
- 1.3. **Deletion of Content from California Residents:** If you are a California resident under the age of 18 and a registered user, California Business and Professions Code Section 22581 permits you to remove content or Personal Information you have publicly posted. If you wish to remove such content or Personal Information and you specify which content or Personal Information you wish to be removed, we will do so in accordance with applicable law. Please be aware that after removal you may not be able to restore removed content. In addition, such removal does not ensure complete or comprehensive removal of the content or Personal Information you have posted and that there may be circumstances in which the law does not require us to enable removal of content.

## 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@walabot.com](mailto:privacy@walabot.com).

\*\*\*