

Privacy Policy for www.walabot.com

This is the privacy policy (“**Privacy Policy**”) that governs how we, **Vayyar Imaging Ltd.** (“**Vayyar**”, “**we**”, “**our**” or “**us**”), use Personal Information (as defined below) that we collect, receive and store about individuals in connection with the use of the website www.walabot.com (together with its sub-domains, content and services, the “**Site**”).

We may choose to engage third party providers to provide cloud, hosting, support or other services. This means that data you provide us or that we collect from you (including any Personal Information, as defined below) – as further described in this Privacy Policy – may be hosted with such third party service providers on servers that they own or control. Regardless of where such third party service providers are located (and some may be located in the US), their servers may be located anywhere in the world (including the US). Your data may even be replicated across multiple servers located in multiple countries. So please be aware that you are consenting to your data being transferred to various third party service providers around the world (including the US).

1. **Introduction.** We have implemented this Privacy Policy because your privacy, and the privacy of other users, is important to us. This Privacy Policy explains our online information practices and the choices you can make about the way your Personal Information is collected and used in connection with the Site. “**Personal Information**” means any information that may be used, either alone or in combination with other information, to personally identify an individual, including, but not limited to, a first and last name, a personal profile, an email address, a home or other physical address, or other contact information and/or social media network account identifications and public profiles, like Facebook, Google+, LinkedIn or Twitter.
2. **Terms of Use.** This Privacy Policy forms part of our Terms of Use which is available at www.walabot.com (“**Terms**”). Any capitalized but undefined term in this Privacy Policy shall have the meaning given to in the Terms.
3. **Consent and Modification.** By using the Site, you consent to the terms of this Privacy Policy and to our collection, processing and sharing of Personal Information for the purposes set forth herein. If you do not agree to this Privacy Policy, please do not access or otherwise use the Site. We reserve the right, at our discretion, to change this Privacy Policy at any time. Such change will be effective 10 days following posting of the revised Privacy Policy on the Site, and your continued use of the Site thereafter means that you accept those changes.
4. **What Personal Information We Collect and How We Collect It.** We do not currently require you to provide Personal Information in order to have access to general information available on the Site. But, we do receive and/or collect Personal Information from you in the following ways:
 - 4.1. **‘Contact Us’ and Customer Support Information.** If you send us a “Contact Us” request or contact our customer support, whether by submitting an online form that we make available, by sending an email to an email address that we display or by contacting us through Facebook, you are required to provide us with certain information such as your name, name of the Facebook account (if you contacted us through Facebook), phone number and email address including information as free text that you choose to include about your reasons for contacting us. We do ask that you do not include any Personal Information in this free text field.
 - 4.2. **Purchase Information.** The Site includes the option to purchase certain products or services from us. When you go through the process of purchasing a product or service from us (even if you do not complete the purchase), we collect your name, shipping address, email and phone number. In addition, we collect your credit card number or paypal account details as applicable and related account and billing information, invoice related information, and other data required to process and ship the order.
 - 4.3. **Subscription Information.** The Site allows you to subscribe to our mailing list to receive information and updates about our products and services including future product and service releases, surveys, requests for reviews and ratings (including on third party sites) and other general marketing content. For this purpose, we collect your name and email address.
 - 4.4. **Log Files.** We may make use of 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 may use such information to analyze trends, administer the Site, track user’s movement around the Site, and gather demographic information.
 - 4.5. **Cookies and Other Tracking Technologies.** Our Site may utilize “cookies”, anonymous identifiers and other tracking technologies in order to for us to operate and make our Site available and present you with information that is customized for you. A “cookie” is a small text file that may be used, for example, to collect information about activity on the Site. Certain cookies and other technologies may serve to recall Personal Information, such as an IP address, previously indicated by a user. You can learn more about cookies on the Internet Advertising Bureau’s website: <http://www.allaboutcookies.org>.
5. **The Way We Use Personal Information.** If you submit or we collect Personal Information through the Site, then we may use such Personal Information in the following ways:
 - 5.1. **To Complete Your Order, Process Your Payments, and Ship the Product to you:**

- We use your Purchase Information to complete your orders of products and services purchased through the Site, including processing your payments, and arranging for delivery to you. We will also use this information to send you messages in connection with the transaction process on the Site (including sending you cart abandonment messages).
- We process this data on the basis of performance of a contract with you.
- If you do not provide us with this information, we cannot complete your purchase and provide you with the product or service you would like to acquire.
- We use third party service providers who will have access to your Purchase Information to assist us in processing your payments and delivering the product or service to you.
 - We use various payment processing service providers to manage credit card and billing processing. If you use such services, you agree to review and be bound by their respective terms of use and privacy policies. We also use such information to ensure the transaction is completed correctly, to resolve any errors or disputes, and for finance and tax reporting purposes.
 - For shipping and delivery, we use a number of warehouses and carriers that assist in fulfilling and shipping the order to your shipping address. In addition, we use various technology vendors & e-commerce tracking solutions that update our warehousing partners and carriers when you have completed an order to arrange for fulfillment, and to notify you of your product's shipping tracking information.
- We will retain this information for no longer than the applicable periods described in the section below "Disputes and Enforcement: Applicable law, regulations or Enforceable Governmental Request".

5.2. Contact Us and Customer Support.

- We use the information that you voluntarily provide us to provide you with customer support, including by phone. We do ask that you do not provide us with unnecessary Personal Information. If you have purchased a product directly from us, or through a third party and then contacted us, we will combine your customer support information with other information we have about you (eg. your Purchase Information).
- We process this data on the basis of a legitimate interest and performance of a contract with you.
- If you do not provide us with this information, we cannot adequately provide you with customer support.
- For this purpose, we use third party service providers who provide the communication infrastructure and interface for this purpose and who will have access to and store your Personal Information, including e-commerce and CRM platforms, and communication services including online chat, video and email services. If you request a return of a product or service, we will transfer your Personal Information to our service providers who provide warehousing, fulfillment shipping and delivery on our behalf (see the Section above "To Complete Your Order, Process Your Payments and Ship the Product or Service to you").
- We will retain this information for no longer than the applicable periods described in the section below "Disputes and Enforcement: Applicable law, regulations or Enforceable Governmental Request".

5.3. Direct Marketing.

- After you have started the process of purchasing a product or service (to the extent that we have collected your name and email address) or completed the purchasing process, or subscribed to our mailing list on the Site (including via a pop-up), we will use your name, email address and purchase history (if applicable) to send you information and updates about our products and services including future product and service releases, surveys, requests for reviews and ratings (including on third party sites) and other general marketing content.
- We process this data on the basis of a legitimate interest (to the extent that we have a business relationship with you in connection with your interest in or purchase of one of our products or services) or your consent (for subscribing to our mailing list).
- Please note that you have the right to object at any time to the processing of your Personal Information for such purposes and to withdraw your consent for such processing. You can ask us to stop sending email marketing, by following the 'unsubscribe' link you will find on all email marketing messages we send you. Alternatively, you can contact us at support@walabot.com. Please note that even if you opt out of receiving all direct marketing emails, we may still send you a response to a "Contact Us" or customer support request as well as administrative emails that are necessary to facilitate your use of the Site. If you opt out of a particular marketing list, we will continue to send you direct marketing emails for any other mailing lists you have subscribed to. If you opt out of all marketing emails, we will stop sending you direct marketing emails altogether.
- If we see through our records that you have expressed interest in our products or services in the past, or have actually purchased our products and services, we will retain this information until you object to the processing of your Personal Information for this purpose. Otherwise, if you just have left your details through our mailing list, we will retain this information for 24 months.
- For direct marketing purposes, we use third party email marketing, survey, contest and e-commerce platforms who will have access to your name and email address to assist us in providing direct marketing to you.

5.4. Tracking Advertising Performance.

- We run online media campaigns to advertise and promote our products and services through various online media channels. In order to measure the performance and effectiveness of these campaigns, we use Cookies and Other Tracking Technologies of our third party media partners on the Site. These partners will receive a cookie ID and your IP address and other non-Personal Information such as your user agent.
- If you are in the European Union, we, and these third party media channels, will process your Personal Information on the basis of your consent when you arrive to the Site.
- This information is stored for one (1) year.
- To opt-out of providing this information from the Site to Vayyar or our third party media partners, please see section headed “[Opting Out of Cookies](#)”.

5.5. Use of the Site.

- We use Log Files and Cookies and Other Tracking Technologies, including IP address to operate, monitor and analyze the Site and provide you with certain features and functionalities on the Site, including if you download the SDK from the Site.
- We will process this information on the basis of a legitimate interest in being able to provide and improve the functionalities of, and product and services offered to you from, the Site. If you are located in the European Union, we also rely on your consent to use cookies when you arrive to the Site.
- We will retain this information for two (2) years.
- With respect to Cookies and Other Tracking Technologies, to opt-out of providing this information to Vayyar, please see section headed “[Opting-Out of Cookies](#)”.
- For this purpose, we use website analytics service providers who will have access to your Personal Information.
- One of the services we use for this purpose is [Hotjar](#). Hotjar helps us to better understand our users’ needs and to optimize the Site and the Site experience (e.g. how much time you spend on which pages, which links you choose to click, what you do and don’t like, etc.), and this enables us to build and maintain our Site with your feedback. Hotjar uses cookies and other technologies to collect data on your behavior and 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 the Site). Hotjar stores this information in a pseudonymized user profile. Hotjar we will never 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 by clicking on [this link](#).

5.6. Disputes and Enforcement; Applicable law, regulations or Enforceable Governmental Request.

- We use your Personal Information to take action in case of a dispute involving you in connection with your use of the Site (including purchasing a product or service from us) and to enforce the terms and conditions applicable to the Site. We also use your Personal Information to comply with legal and regulatory requirements (e.g., the disclosure of information to law enforcement or tax authorities, tax reporting and auditing requirements), to protect against harm to the rights, property or safety of Vayyar, our users, yourself or the public, and to protect against detect, prevent, or otherwise address fraud or security issues.
- For this purpose, we may share your information with law enforcement or other competent authorities and any third party, as may be required (e.g to respond to claims or satisfy any legal process, subpoena, or governmental request; or to protect the rights, property, or personal safety of Vayyar users, its partners, or the general public). We will also share this information with our professional advisors in the scope of this purpose.
- We will retain this Personal Information for the amount of time as required by law to fulfill the above purposes. This may include ensuring that we have an accurate record of your dealings in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your Personal Information or dealings.

5.7. As a general note, for each of the purposes set forth above, we also use the following service providers which are required to fulfill each individual purpose:

- In order to communicate with each other for this purpose, we also use various communication tools such as email and online messaging platforms to communicate with each other.
- The data we use is hosted, managed and backed-up with third party technology vendors we use to provide us with a service.

6. Additional Ways We Share your Personal Information.

- 6.1. We may transfer your Personal Information to our subsidiaries or affiliated companies for the purpose of storing or processing such information on our behalf. Such information may be transferred to other countries around the world. We require that these parties agree to process such information in compliance with our Privacy Policy.
- 6.2. We may share your Personal Information with our third party service providers and partners, but only to assist us with our business operations and to provide our Site resources. Such information may be transferred to other countries around the world. We use commercially reasonable efforts to only engage or interact with third party service providers and partners that

post a privacy policy governing their processing of Personal Information. In addition, we ensure that service providers that have access to personal information provide sufficient undertakings regarding the safety and security of your personal information.

- 6.3. In the event Vayyar goes through a business transition such as a merger or acquisition by another company, consolidation, change of control, reorganization, or sale of all or a portion of its assets, your Personal Information will be among the assets transferred.
7. **Transferring Personal Information From and Outside of the European Union.** We will take appropriate steps to ensure that transfers of your Personal Information are in accordance with applicable laws and carefully managed to protect your privacy rights and interests. To this end, if we as the data controller share your information with our corporate affiliates or third party service providers outside the EEA, we have - prior to sharing your information with such corporate affiliate or third party service provider – established the necessary means to ensure an adequate level of data protection. This may be an adequacy decision of the European Commission confirming an adequate level of data protection in the respective non-EEA country or an agreement on the basis of the EU Model Clauses (a set of clauses issued by the European Commission) or EU - US Privacy Shield certification. We will provide further information on the means to ensure an adequate level of data protection on request.
8. **Use of Anonymous Information.** We may use Anonymous Information or disclose it to third party service providers in order to improve our Site and enhance your experience with the Site. “**Anonymous Information**” means information which does not enable identification of an individual user, such as aggregated information about the use of our Site.
9. **Your Rights.** The following rights (which may be subject to certain exemptions or derogations), shall apply to EU users of the Site:
- You have a right to access Personal Information held about you. Your right of access can 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 ask us to correct inaccurate or incomplete personal information concerning you.
 - If you no longer want us to use your Personal Information, you can request that we erase your Personal Information. Please note that if you request the erasure of your Personal Information, we will not be able to process your transactions or provide you with customer support. We may retain some of your Personal Information as necessary for our legitimate business interests, such as fraud detection and prevention, and enhancing safety. For example, if we suspend the use by a user for fraud or safety reasons, we may retain certain information about that user to prevent them from processing another transaction through the Site. We may also retain and use your Personal Information to the extent necessary to comply with our legal obligations, including for tax, legal reporting and auditing obligations. Also, because we maintain the Site to protect from accidental or malicious loss and destruction, residual copies of your Personal Information may not be removed from our backup systems for a limited period of time.
 - You have a right to restrict the processing of your Personal Information subject to applicable laws.
 - Where you have provided your consent to the processing of your Personal Information by Vayyar you may withdraw your consent at any time by sending a communication to us specifying which consent you are withdrawing. Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal.
 - You have a right to object to our use of your Personal Information for direct marketing purposes. To object to Direct Marketing, please see the “Direct Marketing” Section. For opting out of cookies, please see the section “Opting Out of Cookies” section.
 - You have a right to obtain a portable copy of Personal Information which is processed on the basis of your consent, or which is necessary for the performance of a contract between us. You have a right to have such portable copy of Personal Information transferred to another data controller in a structured, commonly used and machine-readable format.
 - You also have a right to request details of the basis on which your Personal Information is transferred outside the European Economic Area, but you acknowledge that data transfer agreements may need to be partially redacted for reasons of commercial confidentiality.
 - You have a right to lodge a complaint with your local supervisory authority if you have concerns about how we are processing your Personal Information. We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the Personal Information requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

You can exercise your rights by contacting us at support@walabot.com. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly or inform you if we require further information in order to fulfil your request. In the event that your request, 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.

10. **Opting Out of Cookies.** Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser. You can also generally opt-out of receiving personalized ads from third party advertisers and ad networks who are members of the Network Advertising Initiative (NAI) or who comply with the Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising by visiting the opt-out pages on the NAI site and DAA site.
11. **Choice.** At all times, you may choose whether or not to provide or disclose Personal Information. If you choose not to provide mandatory Personal Information, you may still visit parts of the Site but you may be unable to access certain options, programs, offers, and services that involve our interaction with you.
12. **Links to and Interaction with Third Party Products.** The Site may enable you to interact with or contain links to other third party websites, mobile software applications and services that are not owned or controlled by us (each a “**Third Party Site**”). We are not responsible for the privacy practices or the content of these Third Party Sites. Please be aware that the Third Party Sites may collect Personal Information from you. Accordingly, we encourage you to read the terms and conditions and privacy policy of each Third Party Site that you choose to use or interact with.
13. **Children’s Privacy.** The Site is not structured to attract children under the age of 13 years. If we learn that we have collected Personal Information from a child under 13 years, we will delete that information as quickly as possible. If you believe that we might have any such information, please contact us at support@walabot.com.
14. **Security.** The security of Personal Information is important to us. We have implemented and will maintain appropriate technical and organizational security measures, policies and procedures, including generally accepted industry standards, designed to reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to such Personal Information appropriate to the nature of the information concerned. This includes the use of appropriate administrative, physical and technical safeguards, to protect the Personal Information submitted to us. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use reasonable acceptable means consistent with this Privacy Policy and all applicable laws and regulations to protect your Personal Information, we cannot guarantee its absolute security or confidentiality. The security of your Personal Information also depends in part on the security of the device you use to communicate with us and the security you use to protect your user IDs and passwords, so please make sure to take appropriate measures to protect this information. If you have any questions about security on the Site, you can contact us at support@walabot.com.
15. **Merger, Sale or Bankruptcy.** 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 or assign Personal Information in connection with the foregoing events.
16. **Google Analytics.** The Site may use a tool called “Google Analytics” to collect information about use of the Site. Google Analytics collects information such as how often users visit the Site, what pages they visit when they do so, and what other sites they used prior to coming to the 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 personally identifiable information. Google’s ability to use and share information collected by Google Analytics about your visits to and use of the 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/>.
17. **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 support@walabot.com. Please note that we are only required to respond to one request per customer each year.
18. **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 Site.

19. **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 will 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.
20. **Commitment.** We are committed to protecting your privacy. Protecting your privacy online is an evolving area, and we are constantly evolving our Site and products to meet these demands. If you have any comments or questions regarding our Privacy Policy, or your Personal Information that we may be storing and using, please contact us at support@walabot.com.

Last updated: August 8, 2018