# Afimilk Website Privacy Policy

Last updated March 5, 2019

This Privacy Policy applies to the <u>https://www.afimilk.com</u> website and related subdomains (the **"Website"**) managed by Afimilk Agricultural Cooperative Ltd. (**"Afimilk"**, **"we"**, or **"us"**).

Your privacy is important to us. This Privacy Policy is mainly intended to let you know what personal information we may collect about you and how we collect, process and use that information. This Privacy Policy applies to personal information we collect through the Website.

# Acceptance and update of this Privacy Policy

By using the Website, you signify your assent to this Privacy Policy. This Privacy Policy may be updated from time to time by us, at our sole discretion. Your continued use of the Website will be deemed acceptance of any amendment or update to this Privacy Policy. Any data and information that you provide to us while registering to, or using of, the Website will be governed by this Privacy Policy. Any changes made to this Privacy Policy shall be effective immediately following the publishing or posting of such changes through the Website. You hereby agree to review the Privacy Policy published on the Website from time to time and agree that any subsequent access to or use by you of our services and/or the Website shall constitute your acceptance of all the changes thereof. We encourage you to periodically review this Privacy Policy, so to be informed of any updates made from time to time thereto.

#### How we collect information from or about you?

We collect information from you when you submit it to us, for example, when you: (i) enter your information via the "Contact Us" page and submit it to us; (ii) order products and/or services from us; (iii) request information from us; (iv) register for an account or to participate in a conference or in public forums on the Website; (v) opt in or subscribe to our newsletter or for participating in a campaign; or (vi) respond to our customer surveys.

We may also:

- automatically collect usage, analytics, viewing, logs, metrics and other device and technical data when you access our Website or use our services as an end user. For example, when you access our Website or log into our services, our servers will automatically record certain information about your device and browser, and we may collect usage, clickstream, event data, crash data, and other technical data. We, our advertising partners and our service providers may also use technologies such as cookies, beacons, tags, Local Storage Objects (LSOs) (such as HTML5 and Flash LSOs) and scripts to collect this information. Please consult our "Cookie Policy" for further information.
- acquire information from public sources or from third-party sources, such as our advertising and market research partners, including to update or enhance the other information collected about you. Local law may require that you authorize the third party to share your information with us before we can acquire it; and
- automatically acquire information when you reply to or interact with an email we send, such as to track your engagement with our messages or when your replies to our messages contain additional email addresses.

What is the legal basis for processing your personal information?

We collect and process information about you only where we have legal bases for doing so under applicable laws. This means we collect and use your information only where:

- We need it to provide or operate the Website and the services provided to you, including to provide customer support and process your orders, requests, questions and concerns;
- It satisfies another legitimate interest that is not overridden by your data protection interests, including our interest in processing your information for any of the reasons/purposes specified below.

What types of information we collect?

**Personal information**. Personal information is information that could identify you, such as your name, email address, address, other contact details and online identifiers.

**Non-personal information**. Non-personal information is information that cannot be traced back to a specific individual. For example, we track the number of visitors at its website each day.

**Information from Third Party Platforms:** You may allow us to interact with one or more third party social networks or platforms (such as Facebook), which will provide data about you to us ("Social Network(s)"). The information you allow us to access varies by Social Network, and it is affected by the privacy settings you and those that you are connected with establish while using such Social Network. Social Networks are operated, controlled, and maintained by third parties that are not operated, controlled, or maintained by us. We recommend that you read the terms of use or service and privacy policies of those Social Networks to understand how they collect and treat your data and what data they might share with us or other third parties.

## How we use your information?

We process your personal information for the following reasons:

- to allow you to use and interact with the Website;
- to communicate with you from time to time in response to your requests for information or as may be relevant to your account with us;
- to send marketing communications related to our products and services;
- to customize the information Afimilk delivers to you;
- to improve the overall quality of the online experience and for the continued development and improvement of the Website;
- to count, track, and aggregate your activity into our analysis of general traffic flows at the Website (e.g. tracking where traffic comes from, how traffic flows within the google.com properties, etc.);
- as required by applicable law or legal requirements pertaining to records retention or for internal administrative purposes;
- as may be specifically authorized by you from time to time in writing.

## Sharing your Information

Your personal information may be shared with certain members of our staff, as well as external consultants. We may also share your personal information with our affiliates worldwide, who are all governed by this Privacy Policy. We may also share your personal information with our agents worldwide and with third party service providers which process your information on our behalf; however, such agents and service providers will be contractually bound to keep your personal data confidential and appropriately secure.

Other than stated above, we may share your personal information with third parties only under any of the following circumstances: (i) when we have your consent to share the information; (ii) we need to share your information to provide any information, services or goods at you request; (iii) we need to share the information in order to contact you; (iv) we need to disclose your personal information if we are required or believe to be required to do so by law or at the request of any competent authority; (v) we need to enforce the terms of use of any of this Website or any of our products or services; (vi) in connection with a substantial corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the event of bankruptcy; (vii) in any case of dispute or legal proceeding of any kind between you and any member of Afimilk group; (viii) if we believe that you have breached the applicable terms of use or have abused your rights to use any of the our services or products or performed any act or omission that we believe to be violating any applicable law, rules, or regulations; or (ix) in urgent circumstances, to prevent physical harm or damage to any person or property.

We may merge information about you into group data, which may then be shared on an aggregated basis with our clients and/or advertisers; however, your identity or personal information will not be disclosed without your permission.

## How long we retain your information

We will retain your information as needed to fulfil legitimate business purposes in accordance with our internal retention policy and applicable laws and regulations.

If you registered to certain services offered by Afimilk, we may keep your personal information as long as you don't unsubscribe to these services and for additional 60 days.

# How we handle children's Information

We do not knowingly collect personal information from children under the age of 16 without consent from their parent or guardian, and we will delete such information if we become aware that it has been submitted through the Website. If you are a parent or guardian and are concerned about our collection of your child's personal information, please contact us.

## Your Rights

You may ask us for the following: (i) a copy of your information, (ii) to correct your information, (iii) erase or restrict its processing, and (iv) transfer some of your personal information to other organizations. You may also object our processing of your personal information.

Please note as follows:

- We should be able to determine your identity in order to be able to respond to your request.
- We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.
- We are not obliged to delete personal information if we can show that the processing is required under applicable law or regulation, or necessary for a legitimate interest, for example, for the establishment, exercise, or defense of a legal claim.
- If you provide us with your email address, you will always have the opportunity to opt out of receiving email newsletters and promotions through the unsubscribe link in the email communications. We may send you other types of transactional and relationship e-mail communications, such as service announcements, administrative

notices, and surveys, without offering you the opportunity to opt out of receiving them.

- Changing information in your account, or otherwise opting out of receipt of promotional email communications will only affect future activities or communications from us. If we have already provided your information to a third party before you changed your preferences or updated your information, you may have to change your preferences directly with that third party.
- If you do not allow us to collect, or ask us to delete or to stop processing, any of your personal information, we may not be able to provide you with certain features and/or services, and some of the Website's features and some of our services may not work appropriately or adjusted to your interests and preferences.

If you would like to exercise any of your rights, you may contact our Privacy Officer, who's contact details are provided at the bottom of this Privacy Policy. For erasing your personal information from our database or restricting its processing, please download the <u>Data Subject Consent</u> <u>Withdrawal Form</u> from our website, and send it to our Privacy Officer.

If you are unhappy with our processing of your personal information or of an alleged infringement of the General Data Protection Regulation, if and to the extent applicable to you, or other applicable data privacy laws, you may lodge a complaint with a competent supervisory authority.

Transferring your information internationally

We may store and/or process your personal information in countries outside of your own, including in the United States and in Israel. We rely on the European Commission's recognition that some non-European Economic Area (EEA) countries have an adequate level of data protection. In countries, other than EEA countries, which may provide for different data protection rules, we rely on appropriate contractual clauses.

#### Links to other websites

The Website may contain links to sites operated by third parties whose policies regarding the handling of information may differ from ours. These websites and platforms have separate and independent privacy or data policies, privacy statements, notices and terms of use, which we recommend you read carefully.

# Data Security and Integrity

Afimilk is concerned about the security of your data. We have implemented technical and organizational security measures that are designed to help protect your information from unauthorized access, disclosure, use and modification. From time to time, we review our security procedures to consider appropriate new technologies and methods.

Please be aware, though, that despite our efforts, no security measures are perfect or impenetrable. We cannot ensure, and do not warrant or guarantee, that the information you transmit to us will remain secure, nor do we guarantee that this information will not be accessed, disclosed, altered, destroyed or used in an unauthorized manner.

If we learn of a security breach, we may attempt to notify you electronically so that you can take appropriate protective steps. We may also post a notice on the Website or our services if a security breach occurs. Depending on where you live, you may have a legal right to receive a notice of a security breach in writing.

## Cookies

Our Cookie Policy can be viewed on this page [click here]

# Contact Us

If you have any additional questions or concerns about our privacy policy, please contact our Privacy Officer.

Email:dpo@afimilk.com; Phone: +972-4-6754811