

Privacy Policy

Last updated on: [February 25, 2020]

1. General

- 1.1. This website, maintained at the URL address <https://gmtonline.co.il/> (hereinafter: the "**Site**" or the "**Website**"), is operated and maintained by GMT Tech Innovation Ltd. (hereinafter: "**GMT**" or the "**Company**").
- 1.2. The purpose of this privacy policy is to set forth the manner in which the Company collects information about and/or regarding the Users of its Services, as defined below, and how and to what purposes the Company collects such information. The document is written in the male gender for reasons of convenience alone, but refers to both genders.
- 1.3. The terms of the privacy policy set forth below constitute an integral part of the terms of use. The Company may from time to time modify the privacy policy and the terms of use, jointly or severally, so that they reflect technological, business, legal or regulatory changes. Such updates regarding the privacy policy will be published in this document, which will be provided, in its up-to-date version, on the Website.
- 1.4. Before using the Company's Services, please make sure to carefully read and understand the terms of the privacy policy. Your use of the Company's Services, including browsing the Site, will be deemed to be express and informed consent on your part to all the terms, stipulations and notices included in the privacy policy. If you do not consent to the terms of the privacy policy, all or part thereof, do not use the Company's Services, including browsing the Site and/or the app.

2. Definitions

- 2.1. "**Law**" – The Protection of Privacy Law, 5741-1981.
- 2.2. "**Services**" or "**Company's Services**" – All the services provided to the User through the Company and/or its Agents, both services involving the provision of information and services not involving the provision of information, including browsing the Site.



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2.3. **"Agents" or "Company's Agents"** – Authorized representatives on behalf of the Company, who are deployed across the country and who have been authorized by the Company and have obtained all the certificates required in order to act on its behalf, including "concessioners" licensed under the Supervision of Financial Services (Regulated Financial Services) Law, 5776-2016 and/or an effective Continued Practice Certificate issued by the Capital Market Authority.

2.4. **"Personal Information"** – Means any datum or information which you will provide to the Company in an initiated manner on the Site in accordance with the purpose of your application to the Company, and which personally identifies you, or enables your identification (such as your name, your email address, your ID number, your means of payment, et cetera), as well as any information which constitutes "Information" and/or "Sensitive Information" as defined in the Law.

2.5. **"Anonymous Information"** – Means statistical information, which does not personally identify, or enable the identification of, the User, and which is linked to the end device used by the User on the Site (such as the manner of using the Site, the type of the User's browser, the date and time on which the User logged into the Site, et cetera).

2.6. **"You" or "User"** – Any person who uses the Company's Services (as defined above), including by means of a computer and/or other end device or any purpose whatsoever.

3. **Collection of Personal Information**

As part of the use of the Services, you may be required to provide, and the Company may collect, Personal Information of yours or about you by various technological means. The type of Personal Information provided by you and/or collected by Us may change, according to the reason and/or purpose for which you are contacting us.

It is clarified that you are not required to provide such information under law, and that the provision thereof is dependent only on your free will and consent, in order to receive the requested Company's Services. However, the provision of part of such information is required under the provisions of law (as set forth in Section 4.1.4), as well as in order to provide you with the Services requested by you, part or all thereof.

By the mere use and by the provision of information to the Company, you hereby represent and warrant as follows: (A) The Personal Information you will provide on the Site is true, accurate and is your own. You are aware that knowingly providing



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erroneous or false information could amount to a criminal offense; (B) You hereby grant the Company an irrevocable, nonexclusive right of use, unlimited by time, without consideration or any right to receive royalties, transferrable, to make any use whatsoever of the information as set forth in the terms of service and in the privacy policy, subject to any law and according to the Company's discretion, without obtaining additional authorization therefor and without your having any financial and/or other claim and/or demand and/or any suit in connection with such right of use.

3.1. Personal Information as part of the Services

- 3.1.1. Information provided by you for the purpose of performing actions on the Site and/or on the app: You must first sign up for the Site (if you are not signed up thereon) and create a User account. In that situation, you will be required to provide Personal Information of various kinds, such as: ID/passport number, telephone number, date of birth, occupation, address, email address.
- 3.1.2. Personal Information provided by you in the course of submitting various applications to use the Company's Services (including by means of filling out forms): The Personal Information you will be required to provide may change according to the nature of the action you wish to perform through the Company. Thus, for example, actions related to the transfer of funds will require you to, *inter alia*, provide specification regarding the name of the beneficiary to whom the transfer of funds is requested, a country of destination for the transfer of funds, et cetera. If you are empowering another person to act in your name, you will be required to provide your own information and the attorney's information; applications related to insurances will require you to, *inter alia*, provide information regarding your medical condition, and so forth.
- 3.1.3. Additional information about you may be collected and saved in the course of the use of the Services, such as: correspondences with representatives and/or automated representatives, personal content (such as: subjects regarding the transfer of the payment to the beneficiary), in-app chat, your bank account number and any information related to your use of the Services, for the purpose of their operation and in accordance with your request.

3.2. **Personal information you provide about another person.** If, as part of the Services, you are required to provide information about another person (for example, when making money transfers you are required to provide information



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about the beneficiary), you represent and warrant that you are authorized, and have the consents required under any law, to provide the Company with Personal Information of such person for the purpose of the uses made by the Company of such information hereunder.

3.3. Use of Personal Information

In accordance with the Law, you are aware, and give your informed consent thereto, that the Company receives and collects the Personal Information regarding you for the following purposes and uses (as may be updated from time to time):

- 3.3.1. Use of the information to improve, maintain and operate the Services offered to you, to make contact with you, to make decisions regarding You or others, including on subjects of fraud prevention, detection of deceits and/or other illegal activity, the security of the Services, operational purposes, evaluation and risk management.
- 3.3.2. If you tried to sign up on the Site in order to use our Services and such attempt failed, the Company may contact you so as to assist in solving any issue You encountered in the signup process.
- 3.3.3. For purposes of direct mailing: The Company may use, process, improve and enrich such information, including through an information provider, for purposes of maintaining, streamlining, adjustment and marketing of the Company's Services and products, *inter alia* by creating characterization regarding you, including by making marketing offers personalized for you, and may make use of statistical data as set forth in Section 5 below.
- 3.3.4. The Company may send you operational and/or service messages and notices in various ways, *inter alia* by email or by SMS, such as an SMS message containing an identification code for accessing the Site, and various uses of the Services.
- 3.3.5. The Company may contact you, including by way of sending promotional mailing, and may make offers to you and offer you benefits and promotions in connection with its products and Services, by email, SMS, telephone or other means. You may request that your information be removed from the marketing applications mailing list in general by sending an email titled "Request to unsubscribe" to the email address gmt-info@gmtonline.co.il.



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4. Provision of information to third parties

The Company may provide information about you to third parties, from time to time, in several cases, as set forth below, and/or in any other case wherein provision is required, including provision of information to a location outside Israel:

- 4.1. As part of activity vis-à-vis third parties in order to complete the actions requested by you and/or when required for the purpose of operating the Services, including a cloud service provider; within this scope, it is also expected that information will also have to be provided to any other party involved in payment services, including banks, credit card companies or other issuers of means of payment, clearers, consortiums and payment service providers, or beneficiaries or payments.
- 4.2. As part of the outsourcing of an activity of the Company and/or the receipt of Services from various providers, including computing and software services, data processing and cloud services, and so forth.
- 4.3. As part of its activity vis-à-vis companies related in the business aspect, for the purposes of use declared and permitted under any law, for the provision of the Services.
- 4.4. The Company may provide Personal Information to competent authorities in Israel or outside Israel and/or pursuant to a court order and/or insofar as required in order to protect the Company's rights and assets and/or insofar as such provision of information is required under any law, such as the information required by virtue of money laundering laws or the making of reports (regular and/or special) which the Company is required to make regarding its activities and the actions performed by the Users of its Services, even without being obligated to notify you before and/or after making the report, according to its discretion.
- 4.5. Without derogating from all the above, the Company may provide third parties with Anonymous Information as set forth in Section 7.4 below, without restriction. Seeing as such information does not personally identify you, you exempt the Company from any suit and/or demand and/or claim toward the Company therefor.
- 4.6. You are aware that information may be provided to third parties located outside Israel, including to countries granting lesser protection of privacy than the



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protection granted by the laws of the State of Israel. By merely using the Company's Services, you are giving your informed consent thereto.

4.7. The Company warrants that the transfer of information to third parties will be limited solely to the purposes listed herein and only at the scope and extent required according to the Company's discretion. The Company will make adequate efforts to ensure that the recipients of the information will be subject to a duty of confidentiality and information security with respect to the information, under any law.

5. Collection of Anonymous Information

5.1. When you use the Site and/or the app, the Company collects information sent to it by the computer, mobile phone or other device used by you to browse the Site and/or the app, which is Anonymous Information – namely, which does not personally identify you and cannot be attributed to you.

5.2. The Anonymous Information sent to us may include, *inter alia*: information about the pages visited by Users, the type of the device, information about the computer and the connection, mobile devices' network information, statistical data about page views, the language of the interface, traffic to and from the Site, the URL address from which the User got to the Site, et cetera.

5.3. The Company analyzes and uses Anonymous Information, itself or through anyone on its behalf, for the purposes set forth below (as, and insofar as, they may change from time to time): (A) Evaluating the manner in which the Users use the Site, to maintain, improve and promote the Site; (B) Repairing malfunctions; (C) Improving the Site's User experience; (D) Analyzing and segmenting browsing patterns on the Site; (E) Personalizing advertisements according to browsing habits; (F) Any other legal purpose which we deem fit.

5.4. The Company may provide Anonymous Information to third parties acting on its behalf in order to realize the above purposes, and for any other legal purpose which it deems fit. Seeing as such information does not personally identify the User, the User hereby waives any suit and/or claim and/or demand toward the Company in connection with the aforesaid.

6. Cookies

6.1. Cookies are text files created by the User's browser upon being issued a command by the Company's computers. Some of the cookies will expire when



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you close the browser or the relevant application, and others are saved on the memory of your device or computer.

6.2. Be advised that in order to provide some of the Services, the Company uses information retention software, such as cookies – for example, pixels, tags (hereinafter jointly referred to by the generic name "**Cookies**") for the purpose of the ongoing and proper operation thereof, for securing the data contained therein and the information provided, and within this scope, to collect statistical data about the use of the Services in order to make decisions regarding the Services and/or your activity, for verification of information and for identification, prevention of frauds and deceits, to improve the browsing experience, while adjusting the contents and Services to your personal preferences, to characterize the products appropriate for You, to personalize advertisements relevant to you, even when you browse other sites; all for statistical, research, marketing and commercial purposes, and naturally for information security purposes.

6.3. The Cookies contain and collect varied information, such as the pages you visited, the duration of your stay on the Site and/or on the app, where you came to the Site and/or the page from, your IP address, your device's attributes, and information You request to see on logging into the Site, et cetera. Furthermore, it may be that the Cookies will also save information about your browsing habits of other sites, including the sites you browsed, the pages on the sites and any other action performed on them. The information contained in the Cookies is encrypted, and the Company takes precautions to ensure that only its computers or anyone on its behalf can read and understand the information stored thereon.

6.4. The Services may also use third-party cookies – such as cookies of Google Co., like those embedded using Google Analytics, which help us personalize your browsing experience or User experience and gain statistical insights regarding all the uses made of the Services. For more information regarding said Cookies, visit Google's website at <https://www.google.com/intl/en/policies/technologies/ads>, as well as Facebook's policy on Cookies at <https://www.facebook.com/policies/cookies>.

7. Information security

7.1. To create a personal area on the Site, you must enter, *inter alia*, a password according to the instructions listed on the Site and/or on the app. Logging into the Site is done using personal details and a one-time password (OTP) sent to



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the mobile phone as listed on the Company's systems. You are required to report any unauthorized use of your details to the Company.

7.2. Please note that any login to the Site done using your identifying information (such as an ID number and/or your password (including any Personal Information provided using such details) will be deemed to be a login done by you, and you exempt the Company and anyone on its behalf from any liability or responsibility for unauthorized use made of your details, and from the consequences of such use.

7.3. The Company uses customary information security technologies, and will make a reasonable effort to ensure that the Site is free and clean of viruses, worms or trojan horses. The Company will exercise and implement procedures customary in the market for securing your Personal Information against unauthorized access, use or disclosure. However, you are aware that notwithstanding the aforesaid, this does not provide complete security with respect to information provided by you to the Company (whether such information is actually saved on the Company's information systems or is saved and stored at a cloud provider / cloud providers).

7.4. Therefore, it is your responsibility to take basic steps to protect your computer or the end device from which You make the use (including installing antivirus software, locking your computer, changing your passwords, et cetera), in order to protect your Personal Information.

8. Retention of information, right of review, correction and deletion of information

8.1. In general, your Personal Information, or Personal Information about you, will be retained on the Company's database/s for such period of time as the Company requires in order to provide the Services requested by you, as applicable, and for as long as the Company has a legitimate need or a legal or other obligation to retain it under any law. Anonymous Information will be retained on the Company's information systems without a time limit (as long as this is not prohibited under any law).

8.2. You are entitled to review the Personal Information about you retained on the Company's database/s, if any, to request that the information be corrected or deleted, by applying to the Company by email at gmt-info@gmtonline.co.il, and we will act to carry out your request according to the information imposed on us under the Law. However, Personal Information required by the Company in order to continue conducting its business and/or required for a legitimate purpose such as defending itself against suits (all, to the extent required) will



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continue to be retained by the Company for such time as is required by it under law.

9. **Contact us.** You are welcome to contact us on any question, request or problem related to the privacy policy by applying to us at gmt-info@gmtonline.co.il, and we will make every effort to reply to your application as soon as possible.



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