

## Privacy Notice

We at SPIRITT Labs Ltd. and any of its affiliates ("**Spiritt**", "**us**", "**we**", or "**our**") recognize and respect the importance of maintaining the privacy of our customers ("**Users**") and their end users ("**End Users**"). This Privacy Notice describes the types of information we collect from you when you visit our website ("**Website**") or use our human-assisted AI platform to build complex apps ("**Applications**") and the services available thereon ("**Services**"). This Privacy Notice also explains how we process, transfer, store and disclose the information collected, as well as your ability to control certain uses of the collected information. If not otherwise defined herein, capitalized terms have the meaning given to them in the Terms of Service, available at <https://spiritt.io/docs/terms-of-use.pdf> ("**Terms**"). "**You**" means any visitor to the .Website and/or User of the Services

If you are an individual located in the European Union ("**EU Individual**"), some additional terms and rights may apply to you, as detailed herein. Spiritt is the data controller in respect of the processing of Personal Data (as defined below) of visitors to the Website, job applicants and Users of our Services. Our registered office is Hamarganit 34, Ramat Gan, Israel 5258443 and our company number is 516014966. Additional entities who may be .serving as separate, independent controllers are listed below

When we process Personal Data relating to End Users of our Users' Applications in the context of providing Services to our Users, the applicable User serves as the data controller with respect to such Personal Data and we serve as the data processor on its behalf. For more information about the Personal Data we handle as a data processor on behalf of our .Users, please see the section on [End Users](#) below

**Personal Data**" means any information that refers, is related to, or is associated with an identified or identifiable individual or as otherwise may be defined by applicable law. This Privacy Notice details which Personal Data is collected by us in connection with provision of .the Services

### **Privacy Notice Key Points** .1.1

The key points listed below are presented in further detail throughout this Privacy Notice. You can click on the headers in this section in order to find out more information about any .topic. These key points do not substitute the full Privacy Notice

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**Personal Data We Collect, Uses and Legal Basis.** Depending on your usage, we collect **.1** different types of data and we and any of our third-party subcontractors and service providers use the data we collect for different purposes, as specified below. You have no legal obligation to provide us with certain Personal Data, but if you refuse to provide such Personal Data we may not be able to register and provide you with the Services or part thereof.

#### **.Visitors to our Website** **.1.1**

**Contact Information.** If you contact us via email, we will collect your email **.1.1.1** address and the content of your inquiry. If you contact us through the contact or application forms on the Website, we will collect your name, email address, phone number, and the information contained in your message.

**How we use this data:** To respond to your request or inquiry or contact you via email, SMS, WhatsApp or other communication channels. We also use this data for purposes of improvement of our Services

**Legal Basis:** We process this Personal Data based on performance of a contract when we respond to your inquiry and based on our legitimate business interests when we use it for purposes of improvement of our Services.

**Automatically Collected Data** - When you visit the Website, we **.1.1.2** automatically collect information about your computer or mobile device included in your user agent, including non-Personal Data such as your operating system, operating system language, browser application and version, and Personal Data such as your IP address, device ID, as well as your browsing history and any information regarding your viewing, use of our Website. For more information about the cookies and similar technologies we use and how to adjust your preferences, please see the section "Cookies and Similar Technologies" below.

**How we use this data.** (1) to review usage and operations, including in an aggregated non-specific analytical manner, develop new products or services and improve current content, products, and Services; (2) to prevent fraud, protect the security of our Website, and address any problems with the Website; and (3) to provide you with customized content, targeted offers, and advertising related to our products and Services, based on your usage history on the Website, on other third-party sites you may visit or via e-mail.

**Legal Basis:** We process this Personal Data for our legitimate interests to develop and improve our products and Services, review usage, perform analytics, prevent fraud, for our recordkeeping and protection of our legal rights and to market our own products and services. Additional information regarding direct marketing is provided below.

**Job Applicant Data.** If you apply for a job with us or recommend someone **.1.1.3**

else for a job through the Website, we collect your Personal Data. This may include your name, phone number, email address, social media links, recommendations and any other information we may request or that you choose to share with us

How we use this data: We use this data to process your job application and/or recommendation, including to contact you for scheduling purposes and to provide you with updates

Legal Basis: We process this Personal Data based on our legitimate interests to attract and assess candidates for employment

## Users .1.2

**Registration Data** - In order to complete the application form on our Website and/or access the Services, you will be required to fill out an application form and provide us with the following Personal Data: your name, email address, and phone number .1.2.1

How we use this data: (1) to provide you with the Services and to respond to your inquiries and requests and to contact and communicate with you; and (2) to prevent fraud, protect the security of and address any problems with the Services, and to provide you with informational newsletters and promotional materials relating to our Platform and Services, including via email. For more information about our direct marketing activities and how you can control your preferences, please see the Direct Marketing section below

Legal Basis: (1) We process this Personal Data for the purpose of providing the Services to you, which is considered performance of a contract with you, including responding to your inquiries and requests and providing customer support. (2) When we process your Personal Data for the purposes of preventing fraud, protecting the security of and/or addressing problems with the Website and Services and/or for the purpose of providing you with informational newsletters and promotional materials relating to our Services, such processing is based on our legitimate interests

**Payment Data** - If you make a payment for use of the Services, we receive information related to such purchase, such as the last four (4) digits of your credit card number .1.2.2

How we use this data: To process the payment for your purchase and for the purposes of fraud prevention

Legal Basis: We process this Personal Data for the purpose of performance of a contract with you when processing payments. Processing for the purposes of fraud prevention is based on our legitimate interest

**End Users.** We collect and process certain Personal Data of End Users in the context of providing Services to our Users. The types of Personal Data processed are determined by the applicable User. We collect and use this Personal Data as a .1.3

data processor, solely for the purpose of providing Services to the applicable User, at its instruction, and on its behalf. For more information regarding the collection of Personal Data on behalf of a User, please see the User's privacy notice or contact the applicable User directly. We may also process anonymous and aggregate data we collect from End Users in order to improve our Services

## **.Additional Uses .2**

**Statistical Information and Analytics.** We and/or our service providers use analytics tools, including "Google Analytics" to collect and analyze information about the use of the Website, and/or Services, such as how often users visit the Website and Services, what pages they visit when they do so, and what other websites and mobile applications they used prior to visiting the Website. By analyzing the information we receive, we may compile statistical information across a variety of platforms and users, which helps us improve our Website, Services, understand trends and customer needs and consider new products and services, and tailor existing products and services to customer desires. You can find more information about how Google collects information and how you can control such use at <https://policies.google.com/technologies/partner-sites>

**Direct Marketing.** As described above, we may use Personal Data to let you know about our products and Services that we believe will be of interest to you We may contact you by email, telephone or through other communication channels. In all cases, we will respect your preferences for how you would like us to manage marketing activity with respect to you. To protect privacy rights and to ensure you have control over how we manage marketing with you

We will take steps to limit direct marketing to a reasonable and proportionate level and only send you communications which we believe may be of interest or relevance to you

At any time you can email us to request to update or correct your personal profile, or change your preferences for the way in which you would like us to communicate with you, including how you receive details of latest offers or newsletters from us

You can ask us to stop sending email marketing by following the "unsubscribe" link you will find on all the email marketing messages we send you. Alternatively, you can contact us at [info@spiritt.io](mailto:info@spiritt.io)

You can change the way your browser manages cookies, which may be used to deliver online advertising, by following the settings on your browser as explained below. If our marketing activities are based upon your consent, you may withdraw this consent at any time

We recommend you routinely review the privacy notices and preference settings that are available to you on any social media platforms as well as your preferences within your account with us

**Sharing the Personal Data We Collect.** We share your information, including Personal Data, as follows

**Service Providers, and Subcontractors.** We disclose information, including Personal Data we collect from and/or about you, to our trusted service providers

and subcontractors, who have agreed to confidentiality restrictions and who use such information solely on our behalf in order to: (1) help us provide you with the Website and/or Services; (2) aid in their understanding of how users are using our Website and/or Services; (3) for the purpose of direct marketing (see above for .(more details

Such service providers and subcontractors provide us with IT and system administration services, data backup, security, and storage services, data analysis. .and help us serve advertisements and provide other marketing services

Facebook. When you use our Site and/or Services, we also disclose your Personal Data to Facebook, which acts as an independent, separate controller with respect to the collection of your Personal Data. For more information about Facebook's collection and use of your data through the Facebook Pixel, see Facebook's [Data Policy](#) .3.2

Business Transfers. Your Personal Data may be disclosed as part of, or during negotiations of, any merger, sale of company assets or acquisition (including in cases of liquidation). In such case, your Personal Data shall continue being subject .to the provisions of this Privacy Notice .3.3

Law Enforcement Related Disclosure. We may share your Personal Data with third parties: (i) if we believe in good faith that disclosure is appropriate to protect our or a third party's rights, property or safety (including the enforcement of the Terms and this Privacy Notice); (ii) when required by law, regulation subpoena, court order or other law enforcement related issues, agencies and/or authorities; .or (iii) as is necessary to comply with any legal and/or regulatory obligation .3.4

Legal Uses. We may use your Personal Data as required or permitted by any .applicable law, for example, to comply with audit and other legal requirements .3.5

Advertisers. When you click on an ad, whether or not it's on our Website, the relevant advertiser will be alerted that someone has visited the page on which the relevant advertisement was displayed, and may be able to identify that it was you by using certain mechanisms, like cookies. We share Personal Data with such advertisers as follows: (i) with your consent (ii) hashed IDs and/or device identifiers; Advertisers are able to combine the Personal Data they collect .independently with the Personal Data we share .3.6

#### **.International Transfer .4**

We use subcontractors and service providers who are located in countries other than your own, such as Ireland and send them information we receive (including Personal Data). We conduct such international transfers for the purposes described above. We will ensure that these third parties will be subject to written agreements ensuring the same level of privacy and data protection as set forth in this Privacy Notice, including appropriate remedies in the event of the violation of .your data protection rights in such third country .4.1

Whenever we transfer your Personal Data to third parties based outside of the European Economic Area ("**EEA**") and when required under applicable law, we .4.2

ensure a similar degree of protection is afforded to it by ensuring at least one of  
:the following safeguards is implemented

We will only transfer your Personal Data to countries that have been .4.2.1  
deemed to provide an adequate level of protection for Personal Data by  
.the European Commission

Where we use certain service providers not located in countries with an .4.2.2  
adequate level of protection as determined by the European Commission,  
we may use specific contracts approved by the European Commission  
.which give Personal Data the same protection it has in the EEA

Please contact us at [info@spiritt.io](mailto:info@spiritt.io) if you would like further information on the .4.3  
specific mechanism used by us when transferring your Personal Data out of the  
.EEA

**Security**. We have implemented and maintain appropriate technical and organization **5**  
security measures, policies and procedures designed to reduce the risk of accidental  
destruction or loss, or the unauthorized disclosure or access to Personal Data  
:appropriate to the nature of such data. The measures we take include

**Safeguards** – The physical, electronic, and procedural safeguards we employ to .5.1  
protect your Personal Data include secure servers, firewalls, antivirus, and SSL  
.encryption of data

**Access Control** – We dedicate efforts for a proper management of system entries .5.2  
and limit access only to authorized personnel on a need to know basis of least  
.privilege rules, and revoke access immediately after employee termination

**Personnel** – We require new employees to sign non-disclosure agreements .5.3  
.according to applicable law and industry customary practice

**Encryption** – We encrypt the data in transit and in rest using SSL encryption of .5.4  
.data protocols

**Database Backup** – Our databases are backed up on a periodic basis for certain .5.5  
data and are verified regularly. Backups are encrypted and stored within the  
production environment to preserve their confidentiality and integrity, are tested  
.regularly to ensure availability, and are accessible only by authorized personnel

However, no method of transmission over the Internet or method of electronic .5.6  
storage is 100% secure. Therefore, while we strive to use commercially acceptable  
.means to protect your Personal Data, we cannot guarantee its absolute security

As the security of information depends in part on the security of the computer .5.7  
you use to communicate with us and the security you use to protect user IDs and  
.passwords, please take appropriate measures to protect this information

**Your Rights - How to Access and Limit Our Use of Certain Personal Data**. Subject to .6  
applicable law and certain exemptions, and in some cases dependent upon the

processing activity we are undertaking, you have certain rights in relation to the Personal Data that we hold about you, as detailed below. If you are an End User please contact the applicable User to exercise your rights. We will investigate and attempt to resolve complaints and disputes and make every reasonable effort to honor your wish to exercise your rights as quickly as possible and, in any event, within the timescales provided by applicable data protection laws. We reserve the right to ask for reasonable evidence to verify your identity before we provide you with any information and/or :comply with any of your requests, as detailed below

Right of Access. You have a right to know what Personal Data we collect about you .6.1 and, in some cases, to have such Personal Data communicated to you. Subject to applicable law, we may charge you with a fee. Please note that we may not be able to provide you with all the information you request, and, in such case, we .will endeavor to explain to you why

Right to Data Portability. If the processing is based on your consent or .6.2 performance of a contract with you *and* processing is being carried out by automated means, you may be entitled to (request that we) provide you or another party with a copy of the Personal Data you provided to us in a structured, .commonly-used, and machine-readable format

Right to Correct Personal Data. Subject to the limitations in applicable law, you .6.3 may request that we update, complete, correct or delete inaccurate, incomplete, .or outdated Personal Data

Deletion of Personal Data ("Right to Be Forgotten"). If you are an EU Individual, .6.4 you have a right to request that we delete your Personal Data if either: (i) it is no longer needed for the purpose for which it was collected, (ii) our processing was based on your consent and you have withdrawn your consent, (iii) you have successfully exercised your Right to Object (see below), (iv) processing was unlawful, or (v) we are required to erase it for compliance with a legal obligation. We cannot restore information once it has been deleted. Please note that to ensure that we do not collect any further Personal Data, you should terminate your account with us, and clear our cookies from any device where you have accessed our Website. We may retain certain Personal Data (including following your request to delete) for audit and record-keeping purposes, or as otherwise .permitted and/or required under applicable law

Right to Restrict Processing. If you are an EU Individual, you can ask us to limit the .6.5 processing of your Personal Data if either: (i) you have contested its accuracy and wish us to limit processing until this is verified; (ii) the processing is unlawful, but you do not wish us to erase the Personal Data; (iii) it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise, or defend of a legal claim; (iv) you have exercised your Right to Object (below) and we are in the process of verifying our legitimate grounds for processing. We may continue to use your Personal Data after a restriction request under certain .circumstances

Right to Object. If you are an EU Individual, you can object to any processing of .6.6 your Personal Data which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

If you raise an objection, we have an opportunity to demonstrate that we have  
.compelling legitimate interests which override your rights and freedoms

Withdrawal of Consent. You may withdraw your consent in connection with any .6.7  
processing of your Personal Data based on a previously granted consent. This will  
.not affect the lawfulness of any processing prior to such withdrawal

Right to Lodge a Complaint with Your Local Supervisory Authority. If you are an EU .6.8  
Individual, you may have the right to submit a complaint to the relevant  
supervisory data protection authority if you have any concerns about how we are  
processing your Personal Data, though we ask that as a courtesy you please  
.attempt to resolve any issues with us first

## .Data Retention .7

Subject to applicable law, we retain Personal Data as necessary for the purposes .7.1  
set forth above. We may delete information from our systems without notice to  
you once we deem it is no longer necessary for these purposes. Retention by any  
.of our processors may vary in accordance with the processor's retention policy

In some circumstances, we may store your Personal Data for longer periods of .7.2  
time, for instance where we are required to do so in accordance with legal,  
regulatory, tax, audit, accounting requirements and so that we have an accurate  
record of your dealings with us in the event of any complaints or challenges, or if  
we reasonably believe there is a prospect of litigation relating to your Personal  
Data or dealings. To determine the appropriate retention period, we consider the  
amount, nature, and sensitivity of the Personal Data, the potential risk of harm  
from unauthorized use or disclosure of your Personal Data, the purposes for  
which we process your Personal Data, and whether those purposes can be  
.achieved through other means, as well as applicable legal requirements

Please contact us at [info@spiritt.io](mailto:info@spiritt.io) if you would like details regarding the .7.3  
.retention periods for different types of your Personal Data

Cookies and Similar Technologies. We use cookies and similar technologies for a number .8  
of reasons, including to help personalize your experience and to personalize the ads we  
serve you. Third parties through which we provide the Services and/or our business  
partners may be placing and reading cookies on your browser or using web beacons to  
collect information in the course of advertising being served on different websites. When  
visiting this Website, you shall be notified of the use of and placement of cookies and  
.other similar technologies on your device as specified herein

What are Cookies? A cookie is a small piece of text that is sent to a user's browser .8.1  
or device. The browser provides this piece of text to the device of the originating  
.user when this user returns

A "session cookie" is temporary and will remain on your device until you .8.1.1  
.leave the Website

A "persistent" cookie may be used to help save your settings and .8.1.2  
customizations across visits. It will remain on your device until you delete  
.it



First-party cookies are placed by us, while third-party cookies may be .8.1.3  
 .placed by a third party. We use both first- and third-party cookies  
 We may use the terms "cookies" to refer to all technologies that we may .8.1.4  
 use to store data in your browser or device or that collect information or  
 help us identify you in the manner described above, such as web beacons  
 ."or "pixel tags

How We Use Cookies. We use cookies and similar technologies for a number of .8.2  
 reasons, as specified below. We will not place any cookies on your browser that  
 .are not strictly necessary unless you have first consented to the cookie pop up

The specific names and types of the cookies, web beacons, and other similar technologies  
 we use may change from time to time. However, the cookies we use generally fall into one of  
 :the following categories

Type of Cookie	Why We Use These Cookies
Necessary	These cookies are necessary in order to allow the Services to work correctly. They enable you to access the Services, move around, and access different services, features, and tools. Examples include remembering previous actions (e.g. entered text) when navigating back to .a page in the same session. These cookies cannot be disabled
Functionality	These cookies remember your settings and preferences and the choices you make (such as language or regional preferences) in order to help us personalize your experience and offer you enhanced functionality and .content
Security	These cookies can help us identify and prevent security risks. They may be used to store your session information to prevent others from changing .your password without your login information
Performance	These cookies can help us collect information to help us understand how you use our Services, for example whether you have viewed messages or specific pages and how long you spent on each page. This helps us .improve the performance of our Services
Analytics	These cookies collect information regarding your activity on our Services to help us learn more about which features are popular with our users and .how our Services can be improved
Advertising	These cookies are placed in order to deliver content, including ads relevant and meaningful to you and your interests. They may also be used to deliver targeted advertising or to limit the number of times you see an advertisement. This can help us track how efficient advertising campaigns are, both for our own Services and for other websites. Such cookies may track your browsing habits and activity when visiting our Services and .those of third parties

:Third Party Cookies .8.3

Hotjar .8.3.1

Facebook Pixel .8.3.2

Google Analytics .8.3.3

How to Adjust Your Preferences. Most Web browsers are initially configured to .8.4  
 accept cookies, but you can change this setting so your browser either refuses all

cookies or informs you when a cookie is being sent. In addition, you are free to delete any existing cookies at any time. Please note that some features of the Services may not function properly when cookies are disabled or removed. For example, if you delete cookies that store your account information or preferences, you will be required to input these each time you visit

By changing your device settings, you can prevent your device's ad identifier being used for interest-based advertising, or you can reset your device's ad identifier. Typically, you can find the ad identifier settings under "privacy" or "ads" in your device's settings, although settings may vary from device to device. Adjusting your preferences as described in this section herein does not mean you will no longer receive advertisements, it only means the advertisements that you do see will be less relevant to your interests

**Third-Party Applications and Services.** All use of third-party applications or services is at .9 your own risk and subject to such third party's terms and privacy policies

**Communications.** We reserve the right to send you service-related communications, .10 including service announcements and administrative messages, without offering you the opportunity to opt out of receiving them. Should you not wish to receive such communications, you may cancel your account

**Children.** We do not knowingly collect Personal Data from children under the age of .11 sixteen (16). In the event that you become aware that an individual under the age of sixteen (16) has enrolled without parental permission, please advise us immediately

**Changes to the Privacy Notice.** We may update this Privacy Notice from time to time to .12 keep it up to date with legal requirements and the way we operate our business, and we will place any updates on this webpage. Please come back to this page every now and then to make sure you are familiar with the latest version. If we make material changes to this Privacy Notice, we will seek to inform you by notice on our Website or via email

**Comments and Questions.** If you have any comments or questions about this Privacy .13 Notice or if you wish to exercise any of your legal rights as set out herein, please contact us at [info@spiritt.io](mailto:info@spiritt.io)

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