

## PRIVACY POLICY

Last Revised: January 2021

**Radix Technologies Ltd.** ("Company", "we" or "us") is devoted to making sure that all your privacy rights are respected. We take extended measures to ensure that our users' privacy is protected in accordance with all the current and applicable privacy and data protection law.

Please be aware that this Privacy Policy ("**Privacy Policy**") is an integral part of our End User License Agreement, available at: <https://www.radix-int.com/end-user-license-agreement/> ("**EULA**"), whether you are an end user who interacts with our Product or a business partner that engages with us and integrate the Product into your assets. Definitions herein shall have the same meaning as defined in the EULA

This Privacy Policy governs the data processing from the following individuals (collectively "**you**" or "**your**"):

- "**End User(s)**": end user are our Customers' users that use of our Product. Such users have been granted an access to our Product directly by our Customers;
- "**Visitors**": Individuals who visit our website available at: <https://www.radix-int.com/> ("**Site**"); and
- "**Customer(s)**": our customers and business partners that engage directly with us for the purpose of implementing the Product within their organization.

This Privacy Policy explains what data we may be collect from you when using our Product, visiting our website, how such data may be used or shared with others, how we safeguard it and how you may exercise your rights related to your Personal Data (as defined below), among others, and where applicable, as required according to the EU General Data Protection Regulation ("**GDPR**"), the California Consumer Privacy Act ("**CCPA**"), and the United States Children's Online Privacy Protection Act ("**COPPA**").

**In the event you are a California resident and the CCPA applies to you – please also review our CCPA Privacy Notice, <https://www.radix-int.com/ccpa-notice/>**

### **INFORMATION COLLECTED**

We may collect two types of data and information from you, depending on your interaction with us. The first type of information is non-identifiable and anonymous information ("**Non-Personal Information**" or "**Non-Personal Data**" as applicable). We are not aware of the identity of the individual from which we have collected the Non-Personal Information. Non-Personal Information which is being gathered consists of technical information, and may contain, among other things, the type of operating system and type of browser, type of device, Visitors' action in the Site, or approximate geo-location.

The second type of information is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual ("**Personal Information**" or "**Personal Data**" as applicable).

For avoidance of doubt, any Non-Personal Information connected or linked to any Personal Information shall be deemed as Personal Information as long as such connection or linkage exists.

In addition, we may also collect from you, during your registration process and through the usage of our Product certain Personal Data that is considered in certain jurisdictions as sensitive data (e.g., the image/children data is defined as sensitive data) (“**Personal Sensitive Data**”)

Please note:

- 1) You are not required by law to provide us with any information. You can always avoid from providing us certain Personal Information; however, you acknowledge that it may prevent you from engaging in certain Services or using certain features of the Site.
  
- 2) We are considered as the Data Controller of the Personal Information we collect from our Visitors and Business Partners, however regarding the Personal Information we collect from the End Users we are considered a Data Processor (under the GDPR) or a Service Provider (under the CCPA).

***Information we collect from Visitors of our Site***

Type of Personal Information	Purpose of Processing
<p><b>Contact Details</b></p> <p>In the event you contact us for support or other inquiries, either through the <a href="#">online form</a> available on the site, by sending us an email or by other means of communications we make available, you will be requested to provide us your name, email address, and may provide us with your phone number.</p>	<p>We will use this information solely for the purpose of contacting you, responding to your inquiries and provide you with the support or information you have requested. This information is lawfully processed subject our legitimate interest.</p>
<p><b>Online Identifiers</b></p> <p>When you access our site, we may, either directly or indirectly collect your IP address.</p> <p>We may also collect technical Non-Personal Information, as detailed above.</p>	<p>We process this data subject to your consent provided through an applicable cookie notice.</p> <p>Note that, we do not attempt to analyze or determine your identity based on such information or otherwise combine it with any information such as your name or email address. The IP may be collected by our third-party analytic partners that offer ways to opt-out, all as detailed below.</p>
<p><b>Recruitment</b></p> <p>In the event you are interested in joining our team, and wish to submit your CV, you will be required to provide us your name, email address, and CV.</p>	<p>This information is lawfully processed subject our legitimate interest. Your provision of Personal Information in connection with recruiting is voluntary, and you determine the extent of information you provide us. We do not request or require sensitive personal information concerning religion, health,</p>

	sexual orientation, or political affiliation in connection with recruiting. We will use the information you have provided solely to communicate with you, to manage our recruiting and hiring processes, and for compliance with corporate governance and legal and regulatory requirements. If you are hired, the information may be used in connection with employment and corporate management.
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***Information we collect from our Customer***

Type of Personal Information	Purpose of Processing
<p>If you are our Customer, we may collect Personal Information that you are required to submit to us when you engage with us, such as your or your personnel's (in the event applicable) name, email address, other contact details, and payment details.</p>	<p>This information will be processed for the purpose of performing our contract with you.</p> <p>We use this information to provide you with the services you have requested.</p> <p>We will use your email address in order to send you needed information related to the services and our business engagement.</p> <p>In addition, we may send you marketing and promotional messages, offers and discounts. You are able to opt out unsubscribe through a designated link in the email that we will send or contacting us at: <a href="mailto:webmaster@radix-int.com">webmaster@radix-int.com</a></p> <p>Please note that if you choose to unsubscribe from direct marketing, we may still hold your contact details and contact you for updates regarding your use if the Services or any other relevant Service-related information.</p> <p>The direct marketing information is processed subject to legitimate interest.</p>

***End Users of Radix Product***

Type of Personal Information	Purpose of Processing
<p>In the event you are an End User interacting with our Product, you will have to register as a user of our Product ("<b>Product Registration</b>"). Prior to using our Product, you will be required to create, or be assigned with, a username and password and when</p>	<p>We will use this information in order to perform our contract with you, provide you with the Product, and assign your account</p>

<p>you do so you will need to represent and warrant that you are responsible for maintaining the confidentiality of your information and password.</p> <p>During the Product Registration process and usage of the Product we may process Personal Information Google ID and other information related to your google account</p>	
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Our Product enable central management and support of mobile devices and uses the administrator permission of your device. Functioning from the cloud or local network, our Product (including the app offered under the name "Radix MDM" on [Google play store](#)) request sensitive permissions or user data for which the Google Play store policy requires your consent. By installing our Product, you agree to your data being collected for the purposes of effective administration. It is hereby clarified that we are not the Controller for any purpose and we shall be considered as Processor of our Customers and therefore this information will only be accessed by authorized account manager(s) of the Customer. Any collected data, if collected, is stored locally on your device or on the account only, with app statistics used anonymously for group statistics.

As part of the Services you may use our "TeacherView" Chrome Extension, please note this extension solely process information for the purpose of providing the services and this information is not shared with third parties. Further, the TeacherView Chrome Extension is in compliance with the CWS Developer guidelines and specifically with the user data and limited use obligations and requirements.

**CHILDREN'S INFORMATION**

Our Privacy Policy and our privacy practices adhere to the COPAA. It is hereby clarified that some of Customers may be schools, college and other educational organizations which provide you with our Product as part of the services such Customer provide (i.e., distance online teaching). As a processor we process information on behalf of our Customers. Some of our Customers may provide you with our Product to enable distance learning. As such, we may process information on Children as defined under the COPAA and GDPR.

It is hereby clarified that in such cases we are solely the processor of the information provided by our Customers, including information and data collected by our Product and therefor we do not have engage directly with you. If you have concerns or question regarding the processing of your Personal Information please contact us at: [Privacy@radix-int.com](mailto:Privacy@radix-int.com).

In order to use certain features of our Product, you as parent will be requested by our Customers and Admin Users to create a designated Account (as defined in the EULA) on behalf of your child. By creating an Account, you provide your consent to the collection, use and disclosure of your child's Personal Information as described in this Privacy Policy, and as needed per Product. If at any time you do not want you or your child to be bound by these terms, you must deactivate your Account by emailing your request to: [support@radix-int.com](mailto:support@radix-int.com) You

represent and warrant that you will not provide inaccurate, misleading or false information to Radix, and that you will provide only your own or your child's information.

### **HOW WE COLLECT INFORMATION**

Depending on the nature of your interaction with the Site and Services, we may collect information as follows:

- ***Automatically*** – we may use cookies (as elaborated in the section below) or similar tracking technologies to gather some information automatically.
- ***Provided by you voluntarily*** – we will collect information if and when you choose to provide us with the information, such as through a physical agreement, contact us communications, etc. all as detailed in this Privacy Policy.

### **SHARING INFORMATION WITH THIRD PARTIES**

We will not share any Personal Information it collects with any third party. Other than under the following circumstances:

- (i) **Authorized Disclosures.** We may disclose your Personal Data to third parties when you consent to a particular disclosure. Please note that once we share your information with a third party, that information becomes subject to the third party's privacy practices.
- (ii) **Compelled Disclosures.** We will share your information, solely to the extent needed to comply with any applicable law or permitted by it, regulation, legal process or governmental request (e.g., pursuant to law enforcement inquiries, subpoenas or court orders), or when we believe, in good faith, it is required in order to enforce our policies (including our policies and agreements) including investigations of potential violations thereof or to detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues. In addition, we will share your information, solely to the extent needed to establish or exercise our rights to defend against legal claims or to prevent harm to the rights, property or safety of us, our users, yourself or any third party or for the purpose of collaborating with law enforcement agencies or in case we find it necessary in order to enforce intellectual property or other legal rights.
- (iii) **Agents / Service Providers.** We may disclose Personal Data to our trusted agents and service providers so that they can perform requested services on our behalf (among others, as detailed in the "*Cookies and other technologies*" Section above). These entities are prohibited from using your personal information for any purposes other than providing us with requested services.
- (iv) **Business Transfers.** We may share Personal Data, in the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation or asset sale). In the event of the above, our affiliated companies or acquiring company will assume the rights and obligations as described in this Privacy Policy.
- (v) **Explicit Consent.** Pursuant to your explicit approval prior to the disclosure.

For avoidance of doubt, we may transfer and disclose or otherwise use Non-Personal Information or information which is linked to anonymous random identifiers or information that is aggregated in a non-identifiable way, at its own discretion.

### **COOKIES POLICY**

When you access or use the site, we may use “cookies” (or similar technologies), which store certain information on your device (i.e., locally stored) and which will allow us to as enhance your experience of the site. The use of cookies is a standard industry-wide practice. A "cookie" is a small piece of information that a website or assigns and stores on your device while you are viewing a website. Cookies are very helpful and can be used for various different purposes such as allowing you to navigate between pages efficiently and making the interaction between you and our Site quicker and easier, as well as to help customize your experience and for advertising purposes (including personalized advertising). You can find more information about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org). For more information about cookies and your controls in this regard, please review our [Cookies Policy](#)

### **DATA RETENTION**

We retain the information we collect as long as it remains necessary for the purposes set forth above, all in accordance with applicable laws, or until an individual expresses a preference to opt-out. We may at our sole discretion, delete or amend information from our systems, without notice to you, once we deem it is no longer necessary for such purposes. In case you are an end user it is hereby clarified that as a processor of our Customer and your Personal information we are subject to retain and delete the Personal Information according to such Customer's instruction.

### **USER RIGHTS**

We acknowledge that different people have different privacy concerns and preferences. Our goal is to be clear about what information we collect, so that you can make meaningful choices about how it is used. We provide you with the ability to exercise certain choices, rights and controls in connection with your information.

Please review our [Privacy Rights Policy](#) regarding your rights under applicable law.

You may exercise any or all of your above rights in relation to your Personal Data by filling out the Data Subject Request (“DSR”) form available [here](#) and send it to our privacy team at: [privacy@radix-int.com](mailto:privacy@radix-int.com).

### **SECURITY**

We take great care in implementing and maintaining the security of our Product and your information. We employ industry standard procedures and policies to ensure the safety of individuals’ information and prevent unauthorized use of any such. We have implemented technical, physical and administrative security measures to protect the Personal Information. In addition, we limit access to your information on our servers. The data collected by us is stored in

the AWS data servers, for more information regarding the data security provided by AWS, please see: <https://aws.amazon.com/security/>.

Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorized access or abuse our Site and Product, and we make no warranty, express, implied or otherwise, that we will prevent such access. For more information see our Security Policy Overview [here](#).

### **PROTECTING CHILDREN**

The Site is intended for individuals over the age of sixteen (16). Therefore, we do not intend and does not knowingly collect directly Personal Information from children under the age of sixteen (16) and does not wish to do so. We reserve the right to request proof of age at any stage so that we can verify that minors under the age of sixteen (16) are not using the Site.

### **CHANGES TO THE PRIVACY POLICY**

We reserve the right to change this Privacy Policy at any time, so please re-visit this page frequently. In the event of any substantial change of this policy, we will make reasonable efforts to post a clear notice on the site. Such substantial changes will take effect seven (7) days after such notice was provided on the site, dashboard or sent by email. Otherwise, all other changes to this Privacy Policy are effective as of the stated "Last Revised".

***Note to California Residents:*** Notwithstanding the above, as required under the, this Policy will be reviewed and updated every 12 months, as required under the CCPA.

### **DATA TRANSFER**

We may store or process your Personal Information in the EU, United States or in other countries. Thus, any information you provide to us may be transferred to and processed in countries other than the country from which you accessed our Service. We will take appropriate measures to ensure that your Personal Information receives an adequate level of data protection upon its transfer including transferring the Personal Data in accordance with the provisions of the EU [standard contractual clauses](#).

### **ADDITIONAL INFORMATION AND CONTACT US**

If you have any questions (or comments) concerning this Privacy Policy, you are welcome to send us an email at: [privacy@radix-int.com](mailto:privacy@radix-int.com) or and we will make an effort to reply within a reasonable timeframe.

### **DATA PROTECTION OFFICER**

If you have any requests regarding the data collected under this Privacy Policy, including without limitation, requests to remove, delete, amend, modify or transfer the data, please contact our Data Protection Officer at: [dpo@Radix-int.com](mailto:dpo@Radix-int.com). Please include your name, address and email address in any correspondence so that we can respond to your inquiry or request.