

Privacy Policy

Privacy Notice – For general users and clients

Introduction

Novoxel Ltd. (Israel Registration Number 514 65 38 15) (“Novoxel”) takes your privacy very seriously. This Privacy Notice is intended to set out your rights and answer any queries you may have about your personal data. If you need more information, please contact:

info@novoxel.com

In case you have signed a contract with our office or with one of our distributors, your data is being managed at Novoxel.

Our personal information handling policy and procedures have been developed in line with the General Data Protection Regulation (in force from 25 May 2018) and applicable national law.

1. What information do we collect?

Novoxel is a Controller and processor of the personal data you provide us. We collect and process personal data about you when you interact with us and our products, mainly in the cloud system, and when you purchase services from our company. The personal data we collect and process includes:

- your name;
- your username and password;
- your home or work address, email address and/or phone number;
- your job title;
- your payment and delivery details, including billing and delivery addresses and credit card details, where you make purchases from us;
- information related to the browser or device you use to access our website or cloud system;
- and/or any other information you provide

2. How do we use this information and what is the legal basis for this use?

We process the personal data listed in paragraph 1 above for the following purposes:

- As required to establish and fulfil a contract with you, for example, if you make a purchase from us or enter into an agreement to provide or receive services. This may include verifying your identity, taking payments, communicating with you, providing customer services and arranging the delivery or other provision of products or services. We require this information in order to enter into a contract with you and are unable to do so without it;
- to comply with applicable law and regulation;
- in accordance with our legitimate interests in protecting Novoxel's legitimate business interests and legal rights, including but not limited to, use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation);
- To respond to any comments or complaints we may receive from you, and/or in accordance with our legitimate interests including to investigate any complaints received from you or from others, about our website or our products or services;
- we may use information you provide to personalise our communications to you or/and our website or/and products or services for you, in accordance with our legitimate interests;
- to monitor use of our websites and online services. We may use your information to help us check, improve and protect our products, content, services and websites, both online and offline, in accordance with our legitimate interests;
- if you provide a credit or debit card, we may also use third parties (such as POS payment providers) to check the validity of the sort code, account number and card number you submit in order to prevent fraud, in accordance with our legitimate interests and those of third parties;
- we may monitor any customer account to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law and our legitimate interests;
- we may use your information to invite you to take part in market research or

surveys.

We may also send you direct marketing in relation to relevant products and services. Electronic direct marketing will only be sent where you have given your specific consent to receive it, or (where this is allowed) you have been given an opportunity to opt-out. You will continue to be able to opt-out of electronic direct marketing at any time by following the instructions in the relevant communication.

3. With whom and where will we share your personal data?

We may share your personal data with our subsidiaries or distributors to process it for the purposes of inter-group administration and to deliver products or services where elements of these are provided by group companies other than those with which you have directly contracted.

We may also share your personal data with the below third parties:

- marketing and communications agencies where they have agreed to process your personal data in line with this Privacy Notice;
- our suppliers, business partners and sub-contractors;
- search engine and web analytics.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws.

Personal data may also be shared with third party service providers who will process it on behalf of Novoxel for the purposes above. Such third parties include, but are not limited to, providers of website hosting, maintenance, call centre operation, cloud data servicing and identity checking.

In the event that our business or any part of it is sold or integrated with another business, your details will be disclosed to our advisers and those of any prospective purchaser and will be passed to the new owners of the business.

4. How long will you keep my personal data?

We will not keep your personal information for any purpose for longer than is necessary and will only retain the personal information that is necessary in relation

to the purpose. We are also required to retain certain information as required by law or for as long as is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

Where you are a customer, we will keep your information for the length of any contractual relationship you have with us and after that for a period of 12 months.

Where you are a prospective customer and you have expressly consented to us contacting you, we will only retain your data (a) until you unsubscribe from our communications; or, if you have not unsubscribed, (b) while you interact with us and our content; or (c) for 12 months from when you last interacted with us or our content.

In the case of any contact you may have with our customer services team, we will retain those details for as long as is necessary to resolve your query and for two weeks after the query is closed.

We will retain your data for a short time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place. In some instances, laws may require Novoxel to hold certain information for specific periods other than those listed above.

5. Where is my data stored?

Your personal data is processed in Novoxel's office located in Israel. Hosting and storage of your data takes place in several Storage Sites managed by Amazon and Star Ltd. The servers are located in USA, Europe and Israel.

Further information may be obtained from our Privacy Team.

6. What are my rights in relation to my personal data?

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data, clicking the unsubscribe button on any communication we have sent to you or by contacting us.

Where you have consented to us using your personal data, you can withdraw that consent at any time.

If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

You also have the right, with some exceptions and qualifications, to ask us to provide a copy of any personal data we hold about you.

Where you have provided your data to us and it is processed by automated means, you may be able to request that we provide it to you in a structured, machine readable format.

If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data (a) by withdrawing your consent for us to use it; (b) if it is no longer necessary for us to use your personal data; (c) if you object to the use of your personal data and we don't have a good reason to continue to use it; or (d) if we haven't handled your personal data in accordance with our obligations.

7. Where can I find more information about Novoxel's handling of my data?

In the event that you wish to complain about how we have handled your personal data, please contact Data Protection Officer at DPO@Novoxel.com or in writing at 43 Hamelaha st. P.O.Box 8539 Industrial zone Poleg, Netanya, Israel 42505573 or contact other representative at Sixten@Novoxel.com. Our data protection officer will then look into your complaint and work with you to resolve the matter.

If you still feel that your personal data has not been handled appropriately according to the law, you can contact your country's Data Protection Authority and file a complaint with them.