



Privacy Notice

We at Gamitee, Ltd. ("**Gamitee**", or "**us**", "**our**", "**we**") recognize and respect the importance of maintaining the privacy of our customers and their end users. This Privacy Notice describes the types of information we collect from you when you visit our website (the "**Site**") or use our integrated proprietary digital group chat, board and interaction interface (the "**Application**"). This Privacy Notice also explains how we collect, 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://www.gamitee.com/terms-of-use> ("**Terms**"). "**You**" means any adult user of the Application or visitor to the Site, or any parent or guardian of any minor whom you allow to use the Application or visit the Site, and for whom you will be held strictly responsible.

Gamitee is the data controller in respect of some of the processing activities outlined in this Privacy Notice, such as regarding visitors to our Site. Our registered office is 42 Hanasi Harishon St., Rehovot and our registration number is 515613560. When we process information in the context of providing services to our customers ("**Customers**"), such as by means of the Application, including with regard to each Customer's end users, the applicable Customer serves as a controller with respect to such Customer's end user Personal Data (as defined 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.

Privacy Notice Key Points

The key points listed below are presented in further detail throughout this Privacy Notice. These key points do not substitute the full Privacy Notice.

- **Personal Data We Collect.** When you register, we collect Personal Data provided by you, such as your name, email address, age and gender. If you register through a third party log-in/ account registration service (such as Facebook), we collect your basic profile information from such third-party log-in/account registration service, including your friend list, contact info, relationships, work and education. We also collect Personal Data when you visit our Site, use the Application, or contact us with questions or complaints. **During your use of the Application we collect the text and data of the conversation conducted using the Application, including any material (such as regarding products) added to the group board or conversation.** We do not have control of what end users who use our Application on the websites of our Customers write when chatting using the Application. As such, we may collect 'special categories of personal data' (as such term is used in Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation)). In addition, when you visit our Site or use our Application, we automatically collect your IP address and operating system and other information about your use of the Site and/or Application.
- **How We Use Your Personal Data.** We use the information (including Personal Data) we collect and/or receive mainly to administer and provide the Site and/or Application, contact you with administrative information, improve the Site and/or Application, conduct statistical analysis with the goal of increasing sales.
- **Basis for Processing Your Personal Data.** Processing your Personal Data is necessary for the provision of the Site and/or Application to you. Processing for the purposes of developing new and enhancing our products and services, for analytics and usage analysis, for fraud prevention and for security and for our recordkeeping and protection of our legal rights – are all necessary for the purposes of legitimate interests that we pursue. Processing of 'special categories of personal data' is based upon your explicit consent.



- **Sharing the Personal Data We Collect.** We share the Personal Data we collect with our service providers and subcontractors who assist us in the operation of the Site and/or Application and process the information on our behalf and under our instructions. When we act as a processor on behalf of our Customers, we will share your Personal Data, including the content of the chats, with the applicable Customer.
- **International Transfer.** We use service providers and/or subcontractors and/or cooperate with or have business partners and affiliates located in countries other than your own, and send them your Personal Data. We will ensure that we have agreements in place with such parties that ensure the same level of privacy and data protection as set forth in this Privacy Notice. You hereby consent to such international transfer.
- **Security.** We implement industry standard measures aimed at reducing the risks of damage and unauthorized access or use of Personal Data, but they do not provide absolute information security. Such measures include physical, electronic, and procedural safeguards, access control, and other internal security policies.
- **Your Rights.** Subject to applicable law and additional rights as set forth below, you may have a right to access, update and/or delete your Personal Data and obtain a copy of the Personal Data we have collected about you. You have the right to withdraw your consent to processing, if provided, at any time by contacting us as detailed in this Privacy Notice.
- **Data Retention.** We retain information for as long as necessary for the purposes set forth in this Privacy Notice. 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.
- **Use of Cookies and Similar Technologies.** We use cookies and similar technologies to help personalize your experience by helping save your settings and customizations across visits. You can adjust your settings to determine which cookies you do or do not allow. Changing your settings and/or deleting existing cookies may affect the Services.
- **Children.** We do not knowingly collect personally-identifiable information from children under the age of 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 change this Privacy Notice from time to time. Please review the Privacy Notice for such changes.
- **Comments and Questions.** If you have any comments or questions about this privacy notice, or if you wish to exercise your legal rights with respect to your Personal Data, please contact us at team@Gamitee.com.

Personal Data We Collect

We collect information from you when you choose to visit our Site or use our Application. In order to use our Application, you will be required to register and provide us with certain Personal Data, such as your name, email address and date of birth. By logging in through the Facebook login service or any other social profile log-in, we may also receive Personal Data about you as provided by Facebook. Please check Facebook's policies in order to understand what information we receive. Examples of the Personal Data that we collect from you when you engage in any of the activities detailed above, may include your name, birth date, gender, e-mail address and friends list. Such Personal Data may be collected by us through the Site and/or Application.

We also collect Personal Data when you visit our Site, make use of the Application, request information from us, complete online forms, or contact us for any other reason, whether from the Site or from the Application.



In addition, when you visit our Site or use the Application, certain information may be automatically gathered about your computer or mobile device, such as operating system, IP address, device ID, as well as your browsing history (while logged in), your shopping preferences, logs of conversations conducted through the Application, identity of the participants in such conversations, and any information regarding your viewing and purchase history on our Site and/or Application.

It is your voluntary decision whether to provide us with any such Personal Data, but if you refuse to provide such information we may not be able to register you to the Application, respond to your queries and/or provide you with our services.

Some users of the Application may include what would be deemed 'special categories of personal data' (as such term is defined in Regulation 2016/679 Of the European Parliament and of the Council of 27 April 2016 on the Protection of Natural Persons With Regard to the Processing of Personal Data and on the Free Movement of Such Data, and Repealing Directive 95/46/EC (General Data Protection Regulation) ("GDPR") in the contents of their chats. We do not have control over the same and your including such data in the chats demonstrates your explicit consent to our collecting and processing the same on behalf of the Customers.

How We Use Your Personal Data

General

We and any of our trusted third-party subcontractors and service providers use the Personal Data we collect from and about you for any of the following purposes: (1) to provide you with the Site and/or Application; (2) to respond to your inquiries or requests, contact and communicate with you; (3) to develop new products or services and conduct analyses to improve our current content, products, and services; (4) to review the usage and operations of our Site and/or Application; (5) to use your data in an aggregated, non-specific format for analytical purposes (as detailed below); (6) to prevent fraud, protect the security of our Site and/or Application, and address any problems with the Site and/or Application; (7) to provide support; (8) to assist Customers who use our Application with improving their own sales or business and (9) to satisfy our legitimate interests, while at all times ensuring that your rights and freedoms are not affected.

Statistical Information

By analyzing all information we receive, including all information concerning users, we may compile statistical information across a variety of platforms and users ("**Statistical Information**"). Statistical Information helps understand trends and customer needs so that new products and services can be considered and so that existing products and services can be tailored to customer desires. We also use various methods, including data mining and machine learning, to analyze the Data so as to generate insights, predictive models and actionable intelligence for increasing sales ("**Sales Models**"). The final versions of the Sales Models we create will not include personally identifiable information but may include Statistical Information. Statistical Information is anonymous and aggregated and we will not link Statistical Information to any Personal Data. We may share such Statistical Information with any third party, without restriction, on commercial terms that we can determine in our sole discretion. In addition, we may use session data in real-time to promote any products or services, and we may provide such data to others (such as the website on which the Application is used) for such purposes.

Analytics

We and/or our service providers or subcontractors, use analytics tools ("**Tools**") such as Mixpanel to collect information about the use of the Site and/or Application. Such Tools collect information such as how often users visit the Site and/or use the Application, what pages they visit when they do so, and what other sites and mobile applications they used prior to visiting the Site and/or using the Application. The Tools may collect certain Personal Data, and may link such Personal Data to specific



information stored in our customer database. We use the information we get from the Tools to improve our Site and/or Application. Mixpanel's ability to use and share information collected by Mixpanel about your use of the Site and/or Application is restricted by the Mixpanel Terms of Use located at <https://mixpanel.com/legal/terms-of-use/> and the Mixpanel Privacy Policy located at <https://mixpanel.com/legal/privacy-overview/>.

Legal Uses

We may use your Personal Data as required or permitted by any applicable law.

Basis for Processing Your Personal Data

Processing your Personal Data is necessary for the performance of the Terms and the provision of the Site and/or Application to you, including responding to your inquiries or requests, contacting and communicating with you and providing customer support.

Processing for the purposes of developing new products and enhancing our products and services, for analytics and usage analysis, for fraud prevention and security and for our recordkeeping and protection of our legal rights – are all necessary for the purposes of legitimate interests that we pursue. In conducting such processing activities, we balance these legitimate interests against the rights and interests of our users. If you would like more information regarding how we make such determinations, please contact us through the contact information specified below.

Processing of any 'special categories of personal data' is based upon your explicit consent. You may withdraw your consent to such processing activities at any time by contacting us as detailed in this Privacy Notice. We will process your request as soon as reasonably possible, however it may take a few days for us to update our records before any opt out is effective.

Please note that we may process your Personal Data for more than one legal basis depending on the specific purpose for which we are using your Personal Data. Please contact us if you would like details about the specific legal ground we are relying on to process your Personal Data.

Sharing the Personal Data We Collect

We share your information, including Personal Data, as follows:

Business Partners, Service Providers, Affiliates, and Subcontractors

We disclose information, including Personal Data we collect from and/or about you, to our trusted service providers, business partners, affiliates, subcontractors, who use such information to: (1) help us provide you with the Site and/or Application; and (2) aid in their understanding of how users are using our Site and/or Application.

Such service providers, business partners, affiliates, and subcontractors include:

Name	Role	Address
Amazon Web Services, Inc	Cloud computing services	1200 12th Avenue South Suite 1200 Seattle, WA 98144 United States
Mixpanel, Inc.	Analytics services	405 Howard Street Floor 2 San Francisco, CA 94105 United States
Redis Labs, Inc.	Database Storage	5201 Great America Parkway



		Suite 320 Santa Clara, CA 95054 United States
ObjectLabs Corporation	Database Storage	660 York Street Suite 101 San Francisco, CA 94110 United States
Fullstory	Analytics services	120 Ottley Dr NE, Atlanta, GA 30324, USA
Hotjar	Analytics services	Level 2, St Julian's Business Centre, 3, Elia Zammit Street, St Julian's STJ 1000, Malta
Glitch	Cloud computing services	75 Broad Street Suite 1904 New York City, NY 10004, USA
GSuite	Database Storage	Gordon House, Barrow Street, Dublin 4, Ireland

Customer

We are processors for the benefit of our Customers which implement our Application on their websites. They own the data that we process on their behalf, and as such, have full access to this data, including the content of the chats.

Business Transfers

We may transfer our databases containing your Personal Data if we sell our business or part of it, including in cases of liquidation. Information about our users, including Personal Data, may be disclosed as part of, or during negotiations of, any merger, sale of company assets or acquisition and shall continue being subject to the provisions of this Privacy Notice.

Law Enforcement Related Disclosure

We will fully cooperate with any law enforcement authorities or court order requesting or directing us to disclose the identity, behavior or (digital) content and information of or related to an individual, including in the event of any user suspected to have engaged in illegal or infringing behavior. We may also share your Personal Data with third parties: (i) if we believe in good faith that disclosure is appropriate to protect our rights, property or safety (including the enforcement of the Terms and this Privacy Notice); (ii) to protect the rights, property or safety of third parties; (iii) when required by law, regulation subpoena, court order or other law enforcement related issues; or (iv) as is necessary to comply with any legal and/or regulatory obligation. You can request such Personal Data as specified herein by emailing us at team@Gamitee.com.

International Transfer

We use subcontractors and service providers and have business partners and affiliates who are located in countries other than your own (as set forth above) and send them information we receive (including Personal Data). We conduct such international transfers in order to provide you with the Site and/or Application. 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.

Whenever we transfer your Personal Data to third parties based outside of the European Economic Area (EEA), we 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 deemed to provide an adequate level of protection for Personal Data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give Personal Data the same protection it has in the EEA.
- Where we use providers based in the US, we may transfer data to them if they have been certified by the EU-US Privacy Shield which requires them to provide similar protection to Personal Data shared between the Europe and the US or any other arrangement which has been approved by the European Commission.

Please contact us at the contact information listed below if you would like further information on the specific mechanism used by us when transferring your Personal Data out of the EEA.

You hereby consent to such international transfer described above.

Security

We make efforts to follow generally accepted industry standards to protect the Personal Data submitted to and collected by us, both during transmission and once we receive it, including by implementing the below:

Safeguards - The physical, electronic, and procedural safeguard we employ to protect your data include secure servers and SSL encryption of data.

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

Internal Policies - We maintain and regularly review and update our privacy related and information security policies.

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

Encryption - We encrypt the data in transit using secure protocols.

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

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

Your Rights - How to Access and Limit Our Use of Certain Information

You have certain rights in relation to the Personal Data that we hold about you, as detailed below. 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 and Data Portability.** You have a right to know what Personal Data we collect about you and, in some cases, to have the information communicated to you. Subject to the limitations in applicable law, you may be entitled to obtain from us a copy of the Personal Data you provided to us (excluding information that we obtained from other sources) in a



structured, commonly-used, and machine-readable format, and you may have the right to (request that we) transmit such Personal Data to another party. If you wish to exercise this right please contact us letting us know what information in particular you would like to receive and/or transmit. 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, for instance, if the information includes Personal Data about another person. Where we are not able to provide you with information that you have asked for, we will endeavor to explain to you why. We will try to respond to any request for a right of access as soon as possible.

- **Right to Correct Personal Data.** Subject to the limitations in applicable law, you may request that we update, correct or delete inaccurate or outdated Personal Data and/or that we suspend the use of Personal Data, the accuracy of which you may contest, while we verify the status of that Personal Data. We will correct your Personal Data within a reasonable time from the receipt of your written request thereof.
- **Deletion of Personal Data ("Right to Be Forgotten").** In certain circumstances you have a right to have Personal Data that we hold about you deleted. Should you wish to have any Personal Data about you deleted, please contact us, using the contact information specified in this Privacy Notice. Subject to applicable law, we will delete Personal Data provided to us by a user within a reasonable time from the receipt of a written (including via email) request by such user to delete such collected Personal Data. 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 also delete our Application, terminate your account with us and clear our cookies from any device where you have used our Application or visited our Site. We may retain certain Personal Data (including following your request to delete) for audit and record-keeping purposes, as well as other purposes, all as permissible and/or required under applicable law. We may also retain your information in an anonymized form.
- **Account Deactivation.** You can ask us to deactivate your account by contacting us using the information below. In order to deactivate your account, we may ask you for additional information.
- **Right to Restrict Processing:** You may request at any time that we limit the processing of your Personal Data if you believe that either: (i) the Personal Data is inaccurate and wish us to limit processing until we verify its accuracy; (ii) the processing is unlawful, but you do not wish us to erase the Personal Data; (iii) we no longer need the Personal Data for the purposes for which it was collected, but you still need it for the establishment, exercise, or defense 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 either: (a) with your consent; (b) for the establishment, exercise or defense of legal claims; or (iii) to protect the rights of another natural or legal person
- **Right to Object.** Subject to applicable law, you may have the right to object to certain processing of your Personal Data.
- **Withdrawal of Consent.** You may withdraw your consent in connection with any processing of your Personal Data based on a previously granted consent.
- **Supervisory Authority.** If you are a European Citizen, you may have the right to submit a complaint to the relevant supervisory data protection authority.

Data Retention

Subject to applicable law, we retain information as necessary for the purposes set forth above. We may delete information from our systems, without notice to you, once we deem it is no longer necessary for the purposes set forth in this Privacy Notice. We may also retain your information in an anonymized form. In addition, retention by any of our processors may vary, in accordance with the processor's retention policy.

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 through the contact information listed below if you would like details regarding the retention periods for different types of your Personal Data.

Cookies and Similar Technologies

We use cookies and similar technologies 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 browsers, or using web beacons to collect information in the course of advertising being served on different websites. When visiting our Site or using our Application, you shall be asked to accept the terms of this Privacy Notice, including 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 or device. The browser provides this piece of text to the device of the originating user when this visitor returns.

- A "session cookie" is temporary and will remain on your device until you leave the Site and/or Application.
- A "persistent" cookie may be used to help save your settings and customizations across visits. It will remain on your device for much longer or until you delete it.
- First-party cookies are placed by us, while third-party cookies may be placed by a third party. We use both first- and third-party cookies.
- Information may also be collected through web beacons, which are small graphic images ("pixel tags"), which usually work together with cookies in order to identify users and user behavior. These may be shared with third parties.

We may use the terms "cookies" to refer to all technologies that we may use to store data in your browser or device or that collect information or help us identify you in the manner described above.

How We Use Cookies

We use cookies and similar technologies for a number of reasons, for example, in order to help personalize your experience by helping save your settings and customizations across visits and provide you with targeted content matching your interests, which we have identified based on your activity and viewing history on our Site and/or Application.

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 Site and/or Application to work correctly. They enable you to access the Site and/or Application, 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.



Analytics	These cookies collect information regarding your activity on our Site and/or Application to help us learn more about which features are popular with our users and how our Application can be improved.
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How to Adjust Your Preferences

Most Web browsers are initially configured to 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 function improperly when cookies are disabled or removed.

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 advertisement you do see will be less relevant to your interests.

First Party Cookies

Necessary cookie – session I.D cookie – saves the ID of the group session you are currently connected to. We also use analytics cookies by Mixpanel, Hotjar and Fullstory as described above.

Communications

Subject to your consent and applicable law, we may send you e-mail or other messages, browser notifications and/or in-app messages about us or our Services. You may remove your Personal Data from our mailing list and stop receiving future communication from us by following the UNSUBSCRIBE link located at the bottom of each communication or by emailing us at team@Gamitee.com. You will also be given the opportunity to unsubscribe from commercial messages in any such e-mail or message we send, as well as through your account settings. Please note that we reserve the right to send you service-related communications, including service announcements and administrative messages relating to your account, 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 personally-identifiable information from children under the age of 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

When visiting the Site or using this Application, you shall be asked to accept the terms of this Privacy Notice. If you do not agree with the terms hereof, please do not visit the Site or use the Application. We may update this Privacy Notice from time to time –we encourage you to review it periodically. By continuing to access or use the Site and/or Application after those changes become effective, you agree to be bound by the revised privacy notice. We will post the updated Privacy Notice on this page. Please come back to this page every now and then to make sure you are



familiar with the latest version. Any new Privacy Notice will be effective from the date it is accepted by you.

Comments and Questions

If you have any comments or questions about this privacy notice, or if you wish for us to amend or delete your Personal Data, or exercise any other of your legal rights, please contact us at team@Gamitee.com.

Last updated: February 2019