

VERIFYOO PRIVACY POLICY

Last Updated: April 7, 2019

This privacy policy (“**Privacy Policy**”) governs how we, **Verifyoo Ltd.** (together, “**Verifyoo**” “**we**”, “**our**” or “**us**”) use, collect and store Personal Data we collect or receive from or about you (“**User**”, “**you**”) such as in the following use cases:

- (i) When you browse or visit our website, <http://verifyoo.com/Verifyoo/> (“**Website**”);
- (ii) When you make use of, or interact with, our Website
 - a. When you request a demo
 - b. When you subscribe to the email list / newsletters
 - c. When you contact us (e.g. customer support, help, submit a request)
- (iii) When you make use of, or interact with the App mobile software application, and any other mobile software application, that we license (each individually, and collectively, the “**App**”).
 - a. When you create an account, log in
 - b. When you update an existing account
 - c. When Verifyoo's Customers make use of the services
- (iv) When you attend to a marketing event and provide Personal Data
- (v) When you exchange business cards with us
- (vi) When we acquire your Personal Data from third-party sources (such as lead-generation companies)
- (vii) When we use the Personal Data of our service providers
- (viii) When we use the Personal Data of our customers

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest of user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to Personal Data. “**Personal Data**” means any information that can be used, alone or together with other data, to uniquely identify any living human being. Please note that this is a master privacy policy and some of its provisions only apply to individuals in certain jurisdictions. For example, the legal basis in the table below is only relevant for GDPR-protected individuals.

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This Privacy Policy can be updated from time to time and therefore we ask you to check back periodically for the latest version of the Privacy Policy, as indicated below. If there will be any significant changes made to the use of your Personal Data in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

Important note: Verifyoo provides a verification service of a biometric one-time password. For avoidance of doubt, for the purposes of this Privacy Policy, a “**Customer**” is an entity which has executed an agreement with Verifyoo. If you are a person whose biometric information is collected as a result of the services (“**End User**”), please note that the Customer is the responsible party for your personal data, including, for example, obtaining the required consents/legal bases and complying with any applicable privacy laws and/or regulations.

1. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

Data we collect	Why is the data collected and for what purposes?	Legal basis (GDPR only)	Third parties with whom we share your data	Consequences of not providing the data
When you browse or visit our Website				
Analytics For more information, please read Section 11 below.	Website traffic tracking and analytics	Consent Legitimate interest (*)	3 rd party platforms such as for the following purposes: • Google analytics	Cannot collect and store the information
When you make use of, or interact with, our Website				
When you request a demo				
<ul style="list-style-type: none"> • Full name • Email address • Company Name • Message • Any other information that you decide to send/supply us 	<ul style="list-style-type: none"> • To provide a demo 	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract Legitimate interest (e.g. to provide a demo following your request)	3 rd party platforms such as for the following purposes: <ul style="list-style-type: none"> • Zotabox (Marketing tools – Pop-up) • Dropbox (Storage) 	Cannot provide a demo
When you contact us (e.g. customer support, help, submit a request)				
<ul style="list-style-type: none"> • Full name • Email address • Company Name • Message • Any other information that you decide to send/supply us 	<ul style="list-style-type: none"> • To process and answer questions • To provide support (e.g., to solve problems, bugs or issues) 	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract	3 rd party platforms such as for the following purposes: <ul style="list-style-type: none"> • Zotabox (Marketing tools – Pop-up) 	Cannot process your answer Cannot provide support Cannot customize your experience

	<ul style="list-style-type: none"> To customize your experience 	Legitimate interest (e.g. process and respond to a question/query sent by you)	<ul style="list-style-type: none"> Dropbox (Storage) 	
When you make use of, or interact with our App				
When you create an account, log in				
<ul style="list-style-type: none"> Full name Email address Company address Company name User name Device type Usage patterns Any other data you decide to provide/supply 	<ul style="list-style-type: none"> To create an account The verify identity of a user To fulfill your requests for products and/or services To perform/execute the agreement To grant you access to the services (our App) 	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g. sign up to the service)</p>	<p>3rd party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> Amazon (cloud) 	<p>Cannot create an account</p> <p>Cannot verify a user identity</p> <p>Cannot fulfill your request for products and/or services</p> <p>Cannot perform the agreement</p> <p>Cannot grant you access to the services</p>
When you update an existing account				
<ul style="list-style-type: none"> Full name Email address Company address Company name User name Device type Usage patterns Any other data you decide to provide/supply 	<ul style="list-style-type: none"> To update your existing account To perform/execute the agreement 	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g. to update an existing account)</p>	<p>3rd party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> Amazon (cloud) 	<p>Cannot update your existing account</p> <p>Cannot perform the agreement</p>
When Verifyoo's Customers make use of the services				
<p>End user:</p> <ul style="list-style-type: none"> Full name Email address Company address Company name User name Device type Usage patterns Any other data you decide to provide/supply 	<ul style="list-style-type: none"> To perform/execute the agreement To allow our Customer to make use of Verifyoo's services <p>Important note: Please note that our Customer is legally responsible for the collection and processing of personal data about its End Users. Verifyoo is providing a service on behalf of the Customer, so you should contract the Customer for any privacy-related questions.</p>	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g. to perform the agreement)</p>	<p>3rd party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> Amazon (cloud) Dropbox (Storage) 	<p>Cannot perform the agreement</p> <p>Cannot allow our Customer to make use of Verifyoo's services</p>
When you attend a marketing event and provide Personal Data				
<ul style="list-style-type: none"> Full name Email address Company name Phone number Job position Any other data you decide to provide/supply 	<ul style="list-style-type: none"> To establish a business connection 	<p>Consent</p> <p>Legitimate interest (e.g. send you more information about Verifyoo)</p>	<p>3rd party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> Dropbox (Storage) 	<p>Cannot establish a business connection</p>
When you exchange business cards with us				
<ul style="list-style-type: none"> Full Name Business email Company name Job title Phone number Any other data you decide to provide/supply 	<ul style="list-style-type: none"> To establish a business connection 	<p>Consent</p> <p>Legitimate interest (e.g. send you more information about Verifyoo)</p>	<p>3rd party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> Dropbox (Storage) 	<p>Cannot establish a business connection</p>
When we acquire your Personal Data from third-party sources (such as lead-generation companies)				
<ul style="list-style-type: none"> Full Name Business email Company name Job title Phone number 	<ul style="list-style-type: none"> To establish a business connection 	<p>Depending on the context, legitimate interest (B2B marketing), pre-contractual discussions or consent</p>	<p>3rd party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> Dropbox (Storage) 	<p>Cannot establish a business connection</p>
When we use the Personal Data of our service providers and suppliers				
<ul style="list-style-type: none"> Full name Email address Company name Job position Phone number 	<ul style="list-style-type: none"> To contact our service providers To perform the applicable agreement 	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at</p>	<p>3rd party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> Dropbox (Storage) 	<p>Cannot contact our service providers</p> <p>Cannot perform the agreement</p>

<ul style="list-style-type: none"> Any other data you decide to provide/supply 		<p>the request of the data subject prior to entering into a contract.</p> <p>Legitimate interest (e.g. perform the contract, send contract-related communications)</p>		
When we use the Personal Data of our customers				
<ul style="list-style-type: none"> Full name Email address Company name Job position Phone number Any other data you decide to provide/supply 	<ul style="list-style-type: none"> To provide our products and services To perform the applicable agreement 	<p>Processing is necessary for the performance of a contract to which our customer is a party.</p> <p>Compliance with a legal obligation (e.g. tax laws, bookkeeping laws, etc.).</p> <p>Legitimate interest (e.g. send you contract-related communications)</p>	<p>3rd party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> Amazon (cloud) Dropbox (Storage) 	<p>Cannot provide the services and/or our products</p> <p>Cannot perform the agreement</p> <p>Cannot communicate with you</p>

Finally, please note that some of the abovementioned Personal Data will be used for fraud detection and prevention, and for security purposes.

2. PERIOD OF STORAGE OF COLLECTED INFORMATION

Personal Data. Your Personal Data (as described above) will be stored until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we will retain it for a longer or shorter period in accordance with data retention laws. We have an internal data retention policy to ensure that we do not retain your Personal Data perpetually.

3. HOW WE PROTECT AND STORE YOUR INFORMATION

3.1. Security. We have implemented appropriate technical, organizational and security measures designed to reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to such information appropriate to the nature of the information concerned. However, please note that we cannot guarantee that the information will not be exposed as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.

3.2. Retention of your Personal Data. In addition to the retention periods mentioned in Section 1 above, in some circumstances we may store your Personal Data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings.

4. HOW WE SHARE YOUR PERSONAL DATA

In addition to the recipients described in Section 1, we may share your information as follows:

- To the extent necessary, with regulators, to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- If, in the future, we sell or transfer some or all of our business or assets to a third party, we will (to the minimum extent required) disclose information to a potential or actual third party purchaser of our business or assets. In the event that we are acquired by or merged with a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer or assign Personal Data in connection with the foregoing events.
- Where you have provided your consent to us sharing the Personal Data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality); and
- Where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any Personal Data is disclosed.

If you want to receive the list of recipients of your Personal Data, please make your request by contacting us to info@verifyoo.com.

5. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL DATA

Storage: Using Dropbox servers located in US, and Amazon WS servers located in EU (Frankfurt), US East (Ohio).

Access from Israel: Access from Israel (e.g. by our staff located in Israel) is covered by the European Commission’s Adequacy Decision regarding Israel. You can read more here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en

External transfers:

- Where we transfer your Personal Data outside of EU/EEA, for example to third parties who help provide our products and services, we will obtain contractual commitments from them to protect your Personal Data.
- Some of these assurances are well recognized certification schemes like the EU - US Privacy Shield for the protection of Personal Data transferred from within the EU to the United States.
- Where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any Personal Data is disclosed.

6. YOUR RIGHTS

The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by the GDPR):

- You have a right to access information held about you. Your right of access may normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
- You have the right to request that we rectify any Personal Data we hold that it is inaccurate or misleading;

- You have the right to request the erasure of the Personal Data that relates to you. Please note that there may be circumstances in which we are required to retain your data, for example for the establishment, exercise or defense of legal claims;
- The right to object, to or to request restriction, of the processing. However, there may be circumstances in which we are legally entitled to refuse your request;
- The right to data portability. This means that you may have the right to receive your Personal Data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
- You have the right to object to profiling;
- You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place or work or place of alleged infringement) at any time. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority;
- The right to withdraw your consent. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations.
- You also have a right to request details of the basis on which your Personal Data is transferred outside the European Economic Area, but you acknowledge that data transfer agreements may need to be partially redacted for reasons of commercial confidentiality.

You can exercise your rights by contacting us at info@verifyoo.com. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm your identity and for security purposes, before disclosing the Personal Data requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

7. USE BY CHILDREN

We do not offer our products or services for use by children. If you are under 18, you shall not use the Website, or provide any information to the Website without involvement of a parent or a guardian. We do not knowingly collect information from, and/or about children.

8. HOW CAN I DELETE MY ACCOUNT?

Should you ever decide to delete your Account, you may do so by emailing info@verifyoo.com. If you terminate your Account, any association between your Account and information we store will no longer be accessible through your Account. However, given the nature of sharing on the Services, any public activity on your Account prior to deletion will remain stored on our servers and will remain accessible to the public.

9. LINKS TO AND INTERACTION WITH THIRD PARTY PRODUCTS

The Website enables you to interact with or contain links to your Third Party Account and other third party websites, mobile software applications and services that are not owned or controlled by us (each a “**Third Party Service**”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect Personal Data from you. Accordingly, we encourage you to read the terms and conditions and privacy policy of each Third Party Service that you choose to use or interact with.

10. LOG FILES

We make use of log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us. We use such information to analyze trends, administer the Website, track users' movement around the Website, and gather demographic information.

11. ANALYTIC TOOLS

- **Google Analytics.** The Website uses a tool called “**Google Analytics**” to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <http://www.google.com/analytics/terms/us.html/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.

12. CALIFORNIA PRIVACY RIGHTS

California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of Personal Data to third parties for their direct marketing purposes. To make such a request, please send an email to info@verifyoo.com. Please note that we are only required to respond to one request per customer each year.

13. OUR CALIFORNIA DO NOT TRACK NOTICE

We do not track consumers over time and across third party websites and therefore do not respond to Do Not Track signals. We do not allow third parties to collect personally identifiable information about an individual consumer's online activities over time and across different websites when a consumer uses the Services.

14. DELETION OF CONTENT FROM CALIFORNIA RESIDENTS

If you are a California resident under the age of 18 and a registered user, California Business and Professions Code Section 22581 permits you to remove content or Personal Data you have publicly posted. To remove, please send an email to info@verifyoo.com. Please be aware that after removal you will not be able to restore removed content. In addition, such removal does not ensure complete or comprehensive removal of the content or Personal Data you have posted and that there may be circumstances in which the law does not require us to enable removal of content.

15. CONTACT US

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at info@verifyoo.com.