PRIVACY POLICY

[Last Modified: September 25, 2025]

This Privacy Policy ("**Privacy Policy**") governs the processing and transfer of personal data collected or processed by Adler Chomeski Marketing Communication Ltd. and the Adler Chomski group (collectively with its subsidiaries and affiliated companies "**Company**", "**we**", "**us**" or "**our**" and the "**Group**") when we operate our websites and collect and process any of your data as a visitor of our website ("**you**" or "**your**" and "**website**" or "**services**"). This Privacy Policy is an integral part of any other agreement between us ("**Terms**"). Any capitalized terms not defined herein shall have the meanings ascribed to them in the Terms, or under the applicable privacy laws.

This Privacy Policy explains what data we may collect from you, 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), as required under relevant privacy regulation, including without limitation and where applicable the Israeli Privacy Protection Law, 1981.

This Privacy Policy does not pertain to Personal Data relating to our employees, contractors and other staff as part of their employment or engagement with us.

If you have any questions regarding this Privacy Policy or our data practices, you are welcome to contact us at: privacy@acw-grey.co.il.

You are not required by law to provide us with any Personal Data. However, please note that some of our services require the processing of certain Personal Data and without such data we may not be able to provide you with all or part of such services (e.g., without your contact details we will not be able to respond to your inquiries).

1. POLICY AMENDMENTS:

We reserve the right to amend this Policy from time to time, at our sole discretion. The most recent version of the Policy will always be posted on the website. The updated date of the Policy will be reflected in the "Last Modified" heading. Any amendments to the Policy will become effective immediately, unless we notify you otherwise. If we materially change the way in which we process your previously collected Personal Data, we will provide you with prior notice, or where legally required, request your consent prior to implementing such changes. **We strongly encourage you to review this Policy periodically to ensure that you understand our most updated privacy practices.**

2. CONTACT INFORMATION:

You may contact us as follows:

- **By email:** privacy@acw-grey.co.il
- **By Mail:** Derech Begen 50 ,Tel Aviv – Jaffa, Israel.

3. DATA SETS WE COLLECT AND FOR WHAT PURPOSE:

Below you can find information regarding the purposes for which we process your personal data as well as our lawful basis for processing, the definition of "personal" and "non-personal" data, and how it is technically processed.

Non-Personal Data

During your interaction with the services, we may collect aggregated, non-personal non-identifiable information ("**Non-Personal Data** "). We are not aware of the identity of the user from which the Non-Personal Data is collected. We collect Non-Personal Data regarding your use of the services, such as the scope, frequency, latency, pages accessed and viewed, time and date stamp, interactions with content and materials displayed through our services, language preference, and other technical information regarding the device used to access the services, for example type of device, type of browser, operating system, etc.

We may sometimes process and anonymize or aggregate Personal Data and identifiable information in a manner that shall create a new set of data that will be Non-Personal Data. Such a new data set can no longer be associated with any identified natural person. Non-Personal Data may be used by us without limitation and for any purpose.

If we combine Personal Data with Non-Personal Data, the combined information will be treated as Personal Data.

Personal Data

We may also collect from you, directly or indirectly, during your access or interaction with the services, individually identifiable information, namely information that identifies an individual or may, with reasonable effort, be used to identify an individual ("**Personal Data**"). The types of Personal Data that we collect as well as the purpose for processing and the lawfulness are specified in the table below.

As part of our services, we do not knowingly collect or process any Personal Data constituting or revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning a person's health or data concerning a person's sex life or sexual orientation ("**Special Categories of Personal Data**").

The table below details the processing of **Personal Data**, the purpose, lawful basis, and processing operations:

DATA SET	PURPOSE AND OPERATIONS
Contact and Customer Support Information: If you voluntarily contact us in order to purchase our services, or receive our support as a customer, you may be required to provide us with certain Personal Data such as your full name, business email address, and any additional information you decide to share with us.	We will use this data to respond to your inquiry. The correspondence with you may be processed and stored by us to improve our internal operations, as well as in the event we reasonably determine it is needed for future assistance or to handle any dispute you might have with us. We may retain and manage such information using external services and platforms such as CRM systems.
Online Identifiers and Advertising and Targeting data: When you interact with the website and services, we may collect online identifiers such as your Internet Protocol address (IP), Cookie-ID, etc., and other information that relates to your activity through the website, such as pages viewed, click stream data, login time and date stamp, etc. This data might be	Collection of device identifiers is needed for the following purposes: (i) Internal statistics and analysis, for which device identifiers might be combined with usage data, for example, to analyze how many visitors have accessed certain content and from which country (where the country is extracted from the IP address) in order to enhance and improve our website and its content. (iii) Marketing and advertising purposes. Our partners will process this data to manage and deliver advertisements and content more

collected directly by us or through our use of third parties' cookies and advertisement platforms. Similarly, we may collect Ad calls, which is a code shared with advertisers, include zip code, advertiser ID, the webpage you came from, the IP address, approximate location which assists the advertiser to determine which ads to place. The ad-call will also include your preference regarding interest-based advertising as further explained herein.	effectively and personally, including contextual, behavioral, and interests-based advertising based on your activity, preferences or other data available to us or to our business partners and advertisers, including for re-targeting purposes.
Email Marketing: As a user, we will send you materials and marketing content through the email information you provided during your registration.	We will use this information to keep you updated with offers and content such as updates, new capabilities and features, and to send you invoices and supporting documentation. We will always do so in accordance with and to the extent permitted by applicable law.
Careers: If you choose to apply to any position within our Group, we may process and retain you submitted information such as your CV. Employment history, records of the recruitment process and any other data you choose to share with us.	We will use such data for the recruitment process and deciding your suitability to join us, we will keep record of you application and the recruitment process, and subject to applicable law, we may retain your information for offering you other positions in the future.

Please note that the actual processing operation for each purpose of use and lawful basis detailed in the table above may differ. Such processing operation usually includes a set of operations made by automated means, such as collection, storage, use, disclosure by transmission, erasure, or destruction. The transfer of Personal Data to third-party countries, as further detailed in the Data Transfer Section below, is based on the same lawful basis as stipulated in the table above.

In addition, we may use certain Personal Data to prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity thefts, and any other misuse of the services and to enforce the Terms, as well as to protect the security or integrity of our databases, services, and the website, and to take precautions against legal liability. Such processing is based on our legitimate interests.

4. HOW WE COLLECT YOUR INFORMATION:

Depending on the nature of your interaction with us, we may collect the above detailed information from you, as follows:

- ***Automatically*** – we may use cookies (as elaborated in the section below) or similar tracking technologies (such as pixels, tags, agent, etc.) to gather some information automatically.

- ***Provided by you or about you voluntarily*** – we will collect information if and when you choose to place an order through the website, etc.

- ***Provided from third parties*** – where permitted under applicable law and provided with your consent for cookie usage, we may enrich the Personal Data collected about you with data provided by third parties.

Similarly, as part of any recruitment process we may approach former employees for information about you.

5. COOKIES

When you access or use the website, we use "cookies" or similar tracking technologies, which store certain information on your device (i.e., locally stored). The use of cookies is standard industry-wide practice. A "cookie" is a small piece of information that a website assigns and stores on your computer while you are viewing a website. Cookies are used by us for various purposes, including allowing you to navigate between pages efficiently, as well as for statistical purposes, analytic purposes and advertising. You can find more information about our use of cookies here: www.allaboutcookies.org.

There are several types of cookies, including without limitation:

- ***Essential, Functionality, Operation & Security Cookies.*** *These cookies are essential for enabling visitor movement around the website, for the website to function properly, and for security purposes (i.e., used to authenticate visitors, prevent fraudulent use, and protect visitor data from unauthorized parties). This category of cookies either cannot be disabled, or if disabled, certain features of the website may not work.*

- ***Analytic, Measurement & Performance Cookies.*** *These cookies are used to collect information about how visitors use our website, in order to improve our website, content, and the way we offer them, as well as assess the performance of the content and marketing campaigns. These cookies enable us, for example, to assess the number of visitors who have viewed a certain page as well as their country of origin. It enables our website to remember information that changes the way it behaves or looks, such as your preferred language.*

- ***Preference, Targeting & Advertising Cookies.*** *These cookies are used to advertise across the internet and to display relevant ads tailored to visitors based on the parts of the website they have visited (e.g., the cookie will indicate you have visited a certain webpage and will show you ads relating to that webpage).*

You may find more information about the cookies we use as well as opt-out from cookies or change your preferences at any time by using the cookies setting tool available on the footer of our website.

Where we use third-party advertising cookies, such third-party may independently collect, through the use of such tracking technologies, some or all types of Personal Data detailed above, as well as additional data sets, including to combine such information with other information they have independently collected relating to your online activities across their network of websites, for the purpose of enhanced targeting functionality and delivering personalized ads, as well as providing aggregated analytics related to the performance of our advertising campaign you interacted with. These third parties collect and use this information under their own privacy policies, and we are not responsible for their privacy practices.

6. DATA SHARING:

We share your data with third parties, including our partners or service providers that help us operate and make the most of the website. You can find here information about the categories of such third-party recipients.

Categories of Recipients	Additional Information
Our Affiliated Companies within our Group, including international Grey group	We may share Personal Data with our affiliated companies and subsidiaries in order to provide joint services, for example, marketing, improving our services, etc.

Categories of Recipients	Additional Information
Our Service Providers	We share your Personal Data with our trusted service providers and business partners that perform business operations for us on our behalf (as data processors) and pursuant to our instructions. This includes the following categories of service providers: **Advertising and marketing service providers**, who help us with advertising measurements, email marketing, etc.; **Data storage providers**, with whom we entrust the hosting and storage of our data; **Consent Manager (CMP)**, an external service that provides us with the ability to allow website visitors to control and manage their cookies preferences and consent; **General IT and SaaS providers** – providing us with IT systems for the management of our daily conduct; **Data analytics and data management providers**, who help us improve, personalize and enhance our operation. **Data security partners**, who help us detect and prevent potentially illegal acts, violations of our policies, fraud and/or data security breaches and ensure compliance with legal obligations.
Legal and Law Enforcement	We may disclose certain Personal Data to law enforcement, governmental agencies, or authorized third parties, in response to a verified request relating to criminal investigations or alleged illegal activity or any other activity that may expose us, you, or any other visitor to legal liability, and solely to the extent necessary to comply with such purpose.
Corporate Transactions	In the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation, or asset sale) we will share the Personal Data we store with our acquiring company. In any such case, we will oblige the acquiring company to assume the rights and obligations as described in our Privacy Policy.

When we share information with service providers, we ensure they only have access to such information that is strictly necessary for us to operate the website. These parties are required to secure the data they receive and to use the data for pre-agreed purposes only while ensuring compliance with all applicable data protection regulations (however, such service providers may use certain data for their own benefit subject to separate terms agreed upon with you or per your consent, as well as in the case of using merely Non-Personal Data).

7. DATA RETENTION:

In general, we retain the Personal Data we collect for as long as it remains necessary for the purposes set forth above, all under the applicable regulation, or until you express your preference to optout, where applicable.

The circumstances in which we will retain your Personal Information include: (i) where we are required to do so in accordance with legal requirements, or (ii) for us to have an accurate record of your interaction with us in the event of any inquiries or contact requests, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data. Please note that except as required by applicable law, we will not be obliged to retain your data for a particular period, and we may delete it for any reason and at any time, without providing you with prior notice of our intention to do so.

8. **SECURITY MEASURES:**

We take great care in implementing physical, technical, and administrative security measures for the website and services, that we believe comply with applicable regulation and industry standards to prevent your information from being accessed without the proper authorization, improperly used or disclosed, unlawfully destructed, or accidentally lost.

If you feel that your privacy was not dealt with properly or was dealt with in a way that was in breach of our Privacy Policy or if you become aware of a third party's attempt to gain unauthorized access to any of your Personal Data, please contact us at our email.

9. **INTERNATIONAL DATA TRANSFER:**

Due to our global business operation, we may store or process your Personal Data in several territories, including, for example in Israel, the UK, EU, US or in other countries (whether directly or indirectly through the use of our vendors). Thus, your Personal Data may be transferred to and processed in countries other than the country from which you accessed our websites or otherwise the country of your jurisdiction. We will take appropriate measures to ensure that your Personal Data receives an adequate level of data protection upon its transfer in accordance with applicable law.

USE OF INFORMATION FOR MARKETING AND DIRECT MAILING:

As part of the website and/or services, users may be offered the option to subscribe to receive newsletters, marketing materials, and/or commercial messages from us. To subscribe, the user will be required to provide certain details such as full name, email address, and phone number. Subject to applicable law, marketing messages may also be sent to existing customers and/or users who have engaged in negotiations with the Company regarding its services.

We may use this information in order to send users the newsletters, information, and marketing materials in which they have expressed interest. In addition, we may collect and record information regarding the user's interaction with such marketing communications, such as whether emails were opened, links were clicked, and other related usage information.

If you wish to unsubscribe from ay mailing list, you may do so by contacting us directly at privacy@acw-grey.co.il and/or by using any available opt-out mechanism provided by the Company (for example, an "unsubscribe" link included in marketing emails). Please note that even if you unsubscribe from the Company's marketing mailing list, the Company may still send you operational or other non-marketing communications.

10. **YOUR RIGHTS**

The Company respects the privacy of its users and their control over their personal information. A user may request to review information relating to him or her (as defined under the Israeli Privacy Protection Law, 1981) held by the Company. Further, if you find that the information is incorrect and/or not up to date, you may request that it be corrected or deleted. You can submit such request in writing through any of the contact channels provided herein.

When submitting a request for updating, reviewing, or deleting information as described above, the Company may require the user to provide certain details in order to verify the user's identity prior to responding to such request.

In addition, if the information held by the Company is used for the purpose of contacting the user personally, based on the user's belonging to a population group determined according to one or more characteristics, in accordance with the provisions of the Privacy Protection Law (also known as "Direct Mailing"), the user may request in writing that the relevant information relating to him or her be deleted from the Company's databases. Information required by the Company for the management of its business – including documentation of commercial and other activities carried out in connection with our business operations – will continue to be retained by the Company as required by law, but will no longer be used for Direct Mailing purposes.

11. **THIRD PARTY WEBSITES:**

Our Privacy Policy only addresses the use and disclosure of Personal Data we collect from you. To the extent that you disclose your Personal Data to other parties via the website (e.g., by clicking on a link to any other website or location), different rules may apply to their use or disclosure of the Personal Data you disclose to them, and this Privacy Policy does not apply to any such third-party products and services. You agree that we shall have no liability whatsoever with respect to such third-party sites and your usage of them.

12. **ELIGIBILITY AND CHILDREN PRIVACY:**

Our services are not directed nor intended for use by children, and we do not knowingly process, sell or share children's information. We will discard any information that we receive from a user who is considered a "child" immediately upon our discovery that such a user shared information with us. Please contact us at: privacy@acw-grey.co.il, if you have reason to believe that a child has shared any information with us.