

- **Privacy Principles and Policy Renewal**

Your privacy is one of our main concerns. This Privacy Policy explains how information about you is collected, used and disclosed by Safein and its subsidiaries and affiliated companies (“**Safein**”, “**we**”, “**us**”, “**our**”). It also describes the choices available to you regarding the use of, your access to, and how to update and correct your personal information. This Privacy Policy applies to information we collect when you use our services, use or access www.Safein.com, Safein mobile applications, and other online services offered by Safein that link to or reference this policy (collectively, our “**online services**”).

We are committed to maintaining your trust and guarantee you to:

- Keep you informed of our privacy practices;
- Keep your information safe. While we cannot promise perfection, we have implemented security tools that are specifically designed to safeguard your information from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction;
- Ask for your permission before we share your personal information with any third party, in accordance with this Privacy Policy.

We may change this Privacy Policy from time to time. If we do, we will let you know by appropriate means such as by posting the revised policy on this page with a new “Last Updated” date. All changes will become effective when posted unless indicated otherwise. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

- **Collection of Information**

Collection of information provided to Safein by you

We collect information you provide directly to us. For example, the types of personal information we may collect from you when you visit or use our online services include your name, surname, email address, mailing address, personal identification number, birth date, telephone number(s), account numbers, user name and password.

Automatic collection of information

In addition to the personal information described above, we may collect certain information about your use of our online services.

- **Log Information.** We collect log information about your use of the online services, including the type of browser you use, access times, pages viewed, your IP address and the page you visited before navigating to our online services.
- **Device Information.** We collect information about the computer or mobile device you use to access our online services, including the hardware model, operating system and version, unique device identifiers and mobile network information.
- **Location Information.** We may collect information about the location of your device each time you access or use one of our mobile applications or otherwise consent to the collection of this information.
- **Information Collected by Cookies and Other Tracking Technologies.** Our third-party partners or we may use cookies (as well as web beacons or other technologies) to collect and store this and other information about your visit to, or use of, our online services. Cookies are small data files stored on your hard drive or in device memory that help us improve our online services and your experience, and to see which areas and features of our online services are popular. Web beacons are electronic images that may

be used in our online services or emails and help deliver cookies, count visits and understand usage and campaign effectiveness. We may later associate the usage and other information we collect online with personal information about you, as permitted or required by law. Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our online services.

Information collected from other sources

We may also collect information about you from additional online and offline sources including various sanction lists and commercially available third-party sources, such as consumer reporting agencies, for the purposes of verifying eligibility, preventing money laundering activities and securely offering our services to you. We may combine this information with the personal and other information we have collected about you under this Privacy Policy.

- **Use of Information**

The main reason we collect your personal information is to provide you with universal gateway to numerous websites with no separate registration in these websites. In order to achieve this, we need to store relevant information about you, so that we could pass this information to our partner websites when so required with no additional delays. Please note, however, that such sharing of your personal data by us is always subject to your separate consent and no part of your personal data shall be passed to any partnering website until respective consent has been received from you. Once such consent has been granted, no request for subsequent sharing of the same data with the same partnering website will be required. However, you will always be able to terminate the respective sharing of data with the partnering website in your Safein panel.

Apart from the main reason for collecting your personal data (indicated in the above), we may also use the information we collect from you for the following other purposes:

- to help us deliver our Services;
- to administer, evaluate and improve our business (including developing new products and services, improving existing products and services, performing data analytics, monitoring and analyzing trends, and performing accounting, auditing and other internal functions);
- to communicate information to you at the request of our partners;
- to manage our risks;
- to market our Services and products;
- to comply with and enforce applicable laws and regulations, relevant industry standards, contractual obligations and our policies; and
- to carry out any other purpose for which the information was collected.

We may also use data that we collect on an aggregate or unpersonified basis for various business purposes, where permissible under applicable laws and regulations.

- **Sharing of Information**

We may share information about you as follows or as otherwise described in this Privacy Policy:

- with Safein partnering websites as part of the delivery of our Services to you;
- with affiliates, consultants, and other service providers when we believe it will enhance the Services and products we can provide to you or for legal and routine business reasons. For example, we may share

selected details when checking your identity for indicators of fraud during sign up or when providing alerts. These parties are authorized to use your personal information only as necessary to provide these services to us;

- as required or permitted by law, such as to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements, comply with a subpoena, bankruptcy proceedings, or similar legal process. For example, we may share information with regulatory authorities and law enforcement officials when we believe in good faith that such disclosure is necessary to comply with legal requirements. We may share information with third parties where appropriate to protect against fraud or verify or enforce our terms of use, our other rights, or other applicable policies;
- in connection with a merger, acquisition, or sale of all or a portion of its assets; you will be notified via email and/or a prominent notice on our website of any change in ownership, uses of your personal information, and choices you may have regarding your personal information;
- between and among our current and future parents, affiliates, subsidiaries and other companies under common control and ownership; and
- with your consent or at your direction.

We may also share aggregated or anonymized information, which cannot reasonably be used to identify you.

- **Other Considerations**

We may give you choices regarding the sharing of personal information with affiliates and third parties as well as extent of data being shared. Choices you have about the sharing of your personal information will be described in the notices you receive in connection with the products or services you obtain from us.

We also stress that keeping your account information and personal information up-to-date is very important, thus we ask you to update your information as promptly as possible once any changes to this information occur.

Upon request Safein will provide you with details about whether we hold any of your personal information. If you wish to request access, or deletion of your personal information please contact us at support@safein.com. Note that we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time. We will respond to your request within a reasonable timeframe, usually within five business days.