

# Privacy Policy

Effective date: December 01, 2018

Xpandion (“us”, “we”, or “our”) operates the [www.xpandion.com](http://www.xpandion.com) website (the “Service”).

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and of the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this Privacy Policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from [www.xpandion.com](http://www.xpandion.com)

## Definitions

**“Applicable Data Protection Law”** Applicable Data Protection Law means (i) the European General Data Protection Regulation (‘GDPR’), all laws and directives relating to personal data, privacy or databases, including without limitation relating to data collection, processing, storage, use, transfer or destruction, that are in effect or; (ii) any laws in the State of Israel relating to personal data and privacy or (iii) any laws in any other country which apply to our provision of Services.

**“Cookies”** Cookies are small pieces of data stored on your device (computer or mobile device) which may leave traces which, in particular when combined with unique identifiers and other information received by the servers, may be used to create profiles of the natural persons and to identify them.

**“Data Controller”** means a natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

**“Data Processor” or “Service Provider”** Data Processor (or Service Provider) means any natural or legal person who processes Personal Data on behalf of the Data Controller.

**“Data Subject” or “User”** Data Subject is an identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier

such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“**Personal Data**” means any information relating to an identified or identifiable natural person.

## Information Collection and Use

For the purpose of this Privacy Policy, and unless otherwise communicated to you, we are a Data Controller of your Personal Data.

We may collect Personal Data for various purposes involving the provision of the Service to you and the improvement of our service offerings generally. Instances in which we collect your Personal Data can include: (a) registering you for use of the Service; (b) processing your communication of Personal Data during the course of your direct communications to us; and (c) our request of Personal Data from you during the course of providing the Service or improving our service offerings.

When requesting Personal Data, we will make it clear to you, at the point of request, why we are requesting the Personal Data. Please note that while you are not required provide us with Personal Data in the context of obtaining the Service, this choice may limit your ability to use the Service.

## Types of Data Collected

### **Personal Data**

While using our Service, we may ask you to provide us with certain Personal Data. Personal Data may include, but is not limited to:

- Email address
- First name and last name
- Phone number Usage Data

As permitted by Applicable Data Protection Law, we may use your Personal Data to contact you by e-mail with promotional material, which will be accompanied by an unsubscribe link or instructions that will allow you to opt out of receiving future communications.

### **Usage Data, Location Data and Cookies**

From time to time, we may collect information about how users use and access the Service (“Usage Data”) and information about User location (“Location Data”). We will only collect Usage Data and Location Data based if you provide us with permission and only for purposes of improving or customizing the Service.

Usage Data may include information such as your computer’s Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data. With respect to Location Data, you can enable or disable location services when you use our Service at any time, through your device settings.

We use Cookies and similar tracking technologies to track the activity on our Service and hold certain information. As a general rule, we only use essential Cookies that help us provide you with the Service. These Cookies may include session cookies that enable the Service, preference cookies that allow the Service to remember users and security cookies. In addition, third party service providers that we use to enhance the Service may use their own Cookies.

You can instruct your browser to refuse all Cookies or to indicate when a cookie is being sent. However, if you do not accept Cookies, you may not be able to use some portions of our Service.

## Use of Data

Xpandion uses Personal Data for various purposes related to the Service including: (a) Service provision and maintenance; (b) User notification; (c) User interactivity; (d) customer support; (e) Service improvement; (f) Service analytics and usage monitoring; (g) technical support and troubleshooting; and (h) User communications, for which a User has not opted out, which may include the provision of information regarding the Service as well as the transmission of promotional material.

## Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)

Xpandion is committed to Processing Personal Data of individuals who are subject to the GDPR and will base its Processing activities on both a determination of the reason and the specific context for its collection.

Various grounds exist under the GDPR for collection Personal Data including:

- Furthering our legitimate business interests such as fraud prevention, data analytics and the development of new Service features and functionality, when not overridden by User rights including fraud prevention, Service explanations and;
- For legal or compliance purposes including the enforcement of contractual or other legal rights, or as requested by applicable authorities;
- Performing contractual obligations related to the Service or in the context of providing technical support;
- Based on User permission

Personal Data collection based on legal and compliance or contractual fulfillment purposes may include collecting and managing User consents and recording User communications.

## Retention of Data

Xpandion will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations, as required to further ongoing legitimate purposes such as the provision of additional services that a User has requested.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it. If this is not possible, we will securely store your Personal Data and isolate it from any further processing until deletion is possible.

We may also retain usage data for purposes of performing analytics to improve the Services.

## Transfer of Data

Our transfer of Personal Data amongst various jurisdictions will comply to the requirements set forth in Applicable Data Protection Law. Reasons for such transfer may include the protection and enforcement of our legal rights, investigation of fraud and determinations based on data security.

Xpandion will use all reasonable efforts to ensure that any transfer of Personal Data is: (a) treated securely; (b) undertaken in accordance with this Privacy Policy; and (c) limited to organizations or countries that are deemed to have adequate controls in place including with respect to the security of your

data and other personal information. We only select Data Processors that reside or store data in a country that has been designated as clear-listed by the European Union, and, in case of US Data Processors, we verified their Privacy Shield certification before engaging them.

## Disclosure of Data

Disclosure or transfer of your Personal Data will take place in accordance with Applicable Data Protection Law and may occur in the context of:

- A transfer of Personal Data pursuant to a merger, acquisition or asset sale, in which case, we will provide Users with notice prior to transfer and prior to the data becoming subject to an alternate privacy policy;
- Adherence to legal requirements or in response to valid requests by public authorities, including protecting our rights or property, investigating fraud or other wrongdoings related to the services, protection of User safety and other measures used to protect against legal liability

## Security of Data

We use commercially reasonable efforts to ensure that your Personal Data remains secure and to adhere to the requirements of Applicable Data Protection Law with respect to the implementation of data security standards.

## “Do Not Track” Signals Under California Online Privacy Protection Act (CalOPPA)

We do not support Do Not Track (“DNT”). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

## Data Protection Rights Under General Data Protection Regulation (GDPR)

Users that are subject to the protections of the GDPR have certain rights as set forth below. Xpandion is committed to protecting these rights as set forth in the GDPR. Our commitment to the furtherance of these rights includes:

- Informing relevant Users of the Personal Data that Xpandion holds about them and removing the Personal Data of such Users from Xpandion's systems;
- Allowing relevant Users to access, update or to delete their Personal Data, including, where possible, facilitating such activities through the direct adjustment of User account settings section or the provision of a mechanism to contact us at [info@xpandion.com](mailto:info@xpandion.com) to seek assistance;
- Adhering to our obligation to take reasonable steps to verify your identity before updating or removing your information;
- Facilitating your right of rectification, or the right to have your information corrected in the event that it is inaccurate or incomplete and allowing you the ability to correct inaccurate or incomplete Personal Data;
- Providing a mechanism that allows you to obtain from us the erasure of your personal data (in certain cases, as applicable);
- Compliance with your request to object to the processing of your Personal Data (in certain cases, as applicable) and compliance with your right to object to further processing of personal data that has been collected for direct marketing purposes;
- Compliance with requests by applicable Users to restrict the Processing of Personal Data (in certain cases, as applicable);
- Compliance with obligations to restrict the processing of Personal Data (in certain cases, as applicable);
- Assisting with matters related to your right to obtain the portability of Personal Data including the right to be provided with a copy of your Personal Data in a structured, machine-readable and commonly used format and the right to require the transmission of such data to another Controller;
- Compliance with your request to withdraw consent to our Processing of Personal Data, in cases where we have relied on your consent as a condition of Processing;
- Compliance with provisions within the GDPR that restrict data Processing decisions based solely on automated processing

Please note that we may ask you to verify your identity before responding to such requests.

In addition to the above, relevant Users have the right to complain to a Data Protection Authority about our collection and use of your Personal Data and may you also have a private right of action with respect to violations of Applicable Data Protection Law. For more information, please contact your local data protection authority in the European Economic Area (EEA).

## Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used. These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose. We may

use third-party Service Providers to monitor and analyze the use of our Service including Google Analytics, which shares data with other Google services and which may use the collected data to contextualize and personalize the ads of its own advertising network.

Users can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

Xpandion also uses remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use Cookies to inform, optimize and serve ads based on your past visits to our Service. These services may include the use of Google AdWords, Twitter and Facebook.

## **Opting out of Certain Third Party Service Providers**

### **Google**

You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads>

Google also recommends installing the Google Analytics Opt-out Browser Add-on – <https://tools.google.com/dlpage/gaoptout> – for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

### **Twitter**

Twitter remarketing service is provided by Twitter Inc.

You can opt-out from Twitter's interest-based ads by following their instructions: <https://support.twitter.com/articles/20170405>

You can learn more about the privacy practices and policies of Twitter by visiting their Privacy Policy page: <https://twitter.com/privacy>

## Facebook

Facebook remarketing service is provided by Facebook Inc.

You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/164968693837950>

To opt-out from Facebook's interest-based ads follow these instructions from Facebook: <https://www.facebook.com/help/568137493302217>

Facebook adheres to the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in Canada <http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe <http://www.youronlinechoices.eu/>, or opt-out using your mobile device settings.

For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>

## Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility nor any liability for the content, privacy policies or practices of any third party sites or services.

## Children's Privacy

We do not knowingly collect Personal Data from anyone under the age of 18 ("Children"). If you are a parent or guardian of a Child and if you are aware that your Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we will take the required measures to remove that information from our servers.

## Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the “effective date” at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## Contact Us

If you have any questions about this Privacy Policy, you may contact us at:

- By email: [info@xpandion.com](mailto:info@xpandion.com)
- By phone number: 97236244245