

## **Dalet Mobile Apps Privacy Policy**

Dalet S.A. ("Company," "we" or "us") values the privacy of our customers, users and others ("you" or "User") who use the [Dalet](#) mobile phone application (the "App") and its connected services and content (e.g. widgets, feeds and applications), owned or operated by us (collectively, the "Services"). In the provision of the Services, we are committed to maintaining the privacy of your personal information. This privacy policy ("Privacy Policy") explains how personal information is collected, used and disclosed with respect to your use of the Services. Please read this page carefully. If you do not accept this Privacy Policy, you are not permitted to use the Services or the App. We may amend or modify this Privacy Policy at any time with notice provided on the App and/or by notification to your last known email address. Information will be handled according to the Privacy Policy in effect at the time the information is used.

### **What Kinds of Personal Information Do We Collect**

We receive and collect personally identifiable information about individual Users of our Services and the App (such as name, contact information, etc.):

- From you, on a voluntary basis, by specifically requesting it from you (i) when you register for the Services, (ii) when you complete or edit your profile, (iii) when you use or register for certain products and services, (iv) communicate with Dalet; or (v) when you log in with your credentials to the Services using the App; and
- From you, on a voluntary basis, if and when you choose to upload to the Sites or the Services any feedback, evaluations, data, comments, or other documents that contain personal information about you; and
- From your device and App through log files, geolocation services, and messages that are transmitted to you via push notifications.

We may also ask you for other information from time to time, which you may choose to provide or not to provide at your sole discretion, such as information regarding your experiences, interests and preferences, your opinion regarding various features of the Services and the types of information that interests you. In certain instances, personally identifiable information with respect to you may also be received from one or more of our business partners.

### **How Do We Use the Personal Information That We Collect**

In general, we use personal information we collect to process your requests or transactions, to provide you with information or services you request, to inform you about other information, events, products or services we think will be of interest to you, to facilitate your use of, and our administration and operation of, the Sites and the Services, and for the purpose for which the information was provided. For example, we may use the information we collect:

- to send you a welcoming email or text message and to contact you about your use of the Sites and the Services, such as for administrative purposes, to

provide you with customer service or to facilitate your registration for or participation in certain features of the Services;

- to provide you with all of the services, features, and functionality included within the Services, to provide other services, products or information you request and to complete any transactions in connection therewith;
- to send you push notifications or respond to device geolocation requests;
- to respond to your emails, submissions, comments, requests or complaints;
- to request feedback and to enable us to develop, customize and improve the Services and our publications, products and services;
- to contact you about our or a third party's services, products, activities, special events or offers and for other marketing, informational, product development and promotional purposes;
- for the specific purpose for which the information was provided.

Personal information provided online may be linked together or merged with other personal information so that we may better understand your needs and inform you about our products or services and those of our partners. In addition, if we receive information from third parties with whom we have business relationships, we may combine this information with the other personal information we maintain about you. In either case, this Privacy Policy governs this information.

We may use information in your profile without identifying you as an individual to third parties.

We do not knowingly collect or solicit personal information from anyone under the age of 13 or knowingly allow such persons to register for the Services. If you are under 13, please do not attempt to use the Services or send any information about yourself to us, including your name, address, telephone number, or email address. In the event that we learn that we have collected personal information from a child under age 13 without verification of parental consent, we will delete that information as quickly as possible.

### **Opt-In/Opt-Out Policy**

When you complete your profile, send information to Dalet, or register for some Services, you may be presented with a series of choices regarding whether you want to receive certain types of communications from us and/or our business partners and advertisers. If you do not wish to receive any or all of such communications, you may opt-out by responding "no" or clicking the appropriate opt-out box. By opting in to receive any and or all communications, you are granting permission to allow us and our business partners and advertisers to send the selected communications. We reserve the right to send you communications regarding the Services, or to advise you of changes to the Services or other events or occurrences which may affect your access to or use of the Services (such as service announcements, administrative notices and the like) without offering you the opportunity to opt out of them.

If after opting-in to the Services or to receive communications from us and/or our business partners, you wish to opt-out of participation in the Services or from receiving future communications, you may do so at any time. To do so, simply log in to your Services account, go to your profile, and you will find options for editing your opt-in preferences.

### **Internet Protocol (IP) Addresses and Aggregated User Data**

We may collect IP addresses from Users of the Services, and collect and monitor other data and information about the activities of Users of the Services collectively. We only use such data anonymously and in the aggregate. This data is not used to track or monitor personally identifiable information of individual Users. We gather and monitor this data to analyze trends, administer the Services, identify Users when they use the Services, track Users' movements on the Sites and gather broad demographic information for aggregate use. We may share this information with our partners so that they too may understand our User base and Service usage patterns, but only on a collective, aggregated basis and in a manner which does not reveal any personally identifiable information about any individual User.

### **Device capabilities access**

The App may request/require access to your device's microphone, camera or audio/video library, which may be used to send audio, video, or still images to the relevant Dalet Services you are using. Further, the App may access your geolocation services; if you choose to display certain elements from your Dalet site, the location will be displayed on a map with pointing both to the your actual location and the event location or the location may be attached to specific metadata uploaded to the Services or to your Dalet site. Finally, the App will have access to your device calendar, solely for the purposes of storing an event time date and time.

### **Tokens, cookies and log files**

We use tokens, cookies and log files to administer the App and Services. A token identifies the user and the device, and token information may be stored on Dalet servers or at Dalet-enabled customer sites. A log file is a list of recent actions that is maintained by our servers. Cookies, which are small text files recorded on a User's hard drive, are employed by thousands of sites to enhance Users' web viewing experience. Cookies cannot damage user files, nor can they read information from a User's hard drive. Cookies allow sites and advertisers to "remember" Users across pages of a site and across multiple visits to a site. Cookies in and of themselves do not personally identify Users, although they do identify a User's computer. We use cookies for remembering User preferences and current session information. Because of our use of cookies, we can deliver faster service, more consistent, updated results, and a more personalized experience of the Services.

You may be able to use your computer's control panel to disable cookies; but doing so may affect your ease in using the Services. We have no access to or control over any cookies that may be used by linked or other third party sites.

### **Push notifications**

The App is equipped with push notifications, which allow us to send messages to your device such as chats or App update notifications. You consent to our contact

from Dalet on your device through these notifications, but may opt-out on signup or via the specified opt-out mechanisms made available by Dalet.

### **International Users**

The Services are hosted in the region where Dalet provides the Services, or in some cases, the United States and France. Dalet will take all reasonable steps to ensure the privacy of your data and information if transferred outside your home country. If you are using the Services from the European Union, Asia, Australia or any other region with laws or regulations governing personal data collection, use and disclosure that differs from the laws and regulations in the receiving region, this Privacy Policy, and our Terms of Use, then please note that you are authorizing the potential transfer of your personal information to that region and by using the Services you consent to that transfer and to the use of such information in accordance with in-country laws.

### **Security**

Any Services account with your registration information and profile is password protected, so only you (or third parties you provide your password to) can access your account. All personally identifiable information we collect about you is stored in limited-access servers. Our Services have technical, administrative and physical security measures and safeguards in place to protect against the loss, misuse and alteration of the information under our control. While we're committed to placing reasonable and appropriate safeguards to protecting your information against foreseeable risks, no computer system or information can ever be fully protected against every possible hazard, and we cannot guarantee that unauthorized third parties will not be able to circumvent those safeguards or use your personal information for improper purposes.

### **Third Party Sites**

For your convenience, the App or Services may provide links to other sites. When you click on one of these links, you are leaving our App and Services and entering another site. We are not responsible for such third party sites. You should carefully review the privacy statements of any other sites you visit, because those privacy statements will apply to your visit to such other sites.

### **Changes to this Policy**

If and when we makes changes to the App, Dalet may update this Privacy Policy to better reflect those changes. No update to this Privacy Policy will, in itself, alter the choice you already made about how Dalet can use your personal information. Because changes to the Services or updates to this Privacy Policy may occur, you should review this Privacy Policy Statement from time to time. Remember, your decision to continue using the Services after this Privacy Policy is updated will signify that you have agreed to any new terms.

### **Questions or Concerns**

If you have any questions or concerns regarding this Privacy Policy or privacy issues relating to the Services, you can contact us online at [privacy@Dalet.com](mailto:privacy@Dalet.com) or by postal mail at Dalet, S.A., 16 Rue Rivay, 92300, Levallois-Perret, France.