

## PRIVACY POLICY

We encourage you to review this page from time to time for the latest information on our privacy practices.

This Privacy Policy (the “**Privacy Policy**” or the “**Policy**”) describes how Rise Code Ltd. (“**Rise**”, or “**us**” or “**we**” or “**our**”), collects, uses, and shares Personal Data relating to visitors of our website (“**Visitors**”) at [www.risecodes.com](http://www.risecodes.com) (the “**Website**”), as well as prospective customers, business partners, participants at our events, job candidates, or otherwise individuals who interact with our Website, content, emails and communications under our control (collectively, “**Prospects**”).

This Policy is incorporated into and is subject to the terms of use (“**Terms of Use**”), available at: <https://risecodes.com/terms>.

This Policy is not intended to override any rights you may have under other applicable data privacy laws, including terms of any other agreement you may have with us.

Prior to accessing or using our Website, please read this Policy to make sure you fully understand our practices in relation to your personal data. Please note that you are not legally required to provide us with any personal data, and may do so (or avoid doing so) at your own discretion. If you do not wish to provide us with your personal data, or to have it processed by us or any of our Services Providers (defined in Section 5) as described below, or if you disagree with any terms set forth in the Policy, please refrain from accessing or using our Website.

If you have any questions or concerns regarding this policy, please contact us at [support@risecodes.com](mailto:support@risecodes.com)

### 1. WHAT INFORMATION WE MAY COLLECT

When you use the Website, we may collect two types of information (which, to the extent it relates to an identified or identifiable individual, will be deemed as “personal data”):

- (a) **Usage data** about the manner in which you use the Website, that may include connectivity, technical and aggregated usage data, IP addresses, device data (such as type, OS, device ID, browser version, locale and language settings used), approximate geolocation, ‘click-stream’ activity, screen resolution, communication and performance logs, session recordings, issues and bugs, and the cookies and pixels we may install or utilize on your device.
- (b) **Directly Identified data** about Visitors or Prospects that may include names, email addresses, organization for which our Prospects work, position, resumes and information contained therein when submitted by job candidates, or otherwise personal data and content included in interactions or communications you may have with us.

### 2. DATA COLLECTION

There are three main methods we use, either independently or through the help of third-party services, as detailed below:

- a) **Personal data you provide** - When You use our Website and/or contact us, you may voluntarily

provide personal data included in your communications with us (e.g. name, email address, phone number).

- b) **Personal data we collect when You use the Website** - when You use the Website, we may collect and record information related to such use.
- c) **Personal data we receive from third parties** – we may receive personal data about you from our Service Providers (as further detailed in Section 5 below) or other third parties, such as from an event organizer of an event you participated in.

### **3. PERSONAL DATA USES**

We use personal data as necessary for the facilitation and performance of our Website; to comply with our legal and contractual obligations; and to support our legitimate interests in maintaining and improving our Website, providing services and technical support, and protecting and securing our Website's Visitors, Prospects and otherwise individuals who interact with us.

If you reside or are using the Website in a territory governed by privacy laws under which "consent" is the only or most appropriate legal basis for the processing of personal data (in general, or specifically with respect to the types of personal data you expect or elect to process or have processed by, or via the Website, e.g., 'special categories' under the GDPR), providing such personal data and using the Website, as well as your acceptance of our Terms of Use and this Privacy Policy will be deemed as your consent to the processing of your personal data for all purposes detailed in this Policy. If you wish to revoke such consent, please contact us at [support@risecodes.com](mailto:support@risecodes.com).

Specifically, we use personal data for the following purposes:

- a) To facilitate and operate the Website;
- b) For authentication and identification purposes, and to allow our Visitors to use our Website;
- c) To provide assistance and support;
- d) To share your data with our Service Providers (in accordance with Section 5);
- e) To gain a better understanding on how you use and interact with our Website, and how we could improve the user experience for you and others, and continue improving the overall performance of the Website;
- f) To facilitate, sponsor and offer certain events, contests and promotions;
- g) To support and enhance our data security measures, including for the purposes of preventing and mitigating the risks of fraud, error or any illegal or prohibited activity;
- h) To create aggregated statistical data, inferred non-personal data or anonymized or pseudonymized data (rendered non-personal), which we or our business partners may use to provide and improve our respective services, or for any other purpose; and
- i) To comply with applicable laws and regulations.

### **4. HOW WE SHARE INFORMATION WITH THIRD PARTIES**

We will not share any personal data we collect with any third party, except in the following specific cases: (a) to comply with any applicable law, regulation, legal process, subpoena or governmental request, with or without notice; (b) to enforce this Policy and/or our Terms of Use, including potential violations thereof; (c) to detect, prevent, or otherwise address fraud, security or technical issues; (d) respond to claims that content available on the Website may violate third party rights; (e) with our subsidiaries and affiliated companies, for

the purposes described in this Policy; (f) in order to protect our rights and safety as well as the rights and safety of Visitors; (g) when We undergo any change in control, including by means of merger, acquisition or purchase of all or substantially all of our assets; or (h) to collect, hold and/or manage your personal data through authorized third party service providers for business purposes.

## 5. THIRD PARTY SERVICE PROVIDERS

We may engage selected third-party Service Providers to perform services on our behalf or complementary to our own. Such Service Providers may provide hosting and server co-location services, communications and content delivery networks (CDNs), billing and payment processing services, data and cyber security services, fraud detection and prevention services, web and mobile analytics, e-mail, text messages and web/mobile notification distribution, monitoring and analytics services, data optimization and marketing services, social and advertising networks, content providers, e-mail, voicemails, support and customer relation management systems, call and session recording services, and our legal, financial and compliance advisors (collectively, our “Service Providers”).

These Service Providers may have access to your personal data, depending on each of their specific roles and purposes in facilitating and enhancing our Website, and may only use it for such limited purposes as determined in our agreements with them. Should you decide to directly engage with any of our Service Providers, please note that such engagement is beyond the scope of the terms applicable to your engagement with us, including this Privacy Policy, and will therefore be covered by the Service Provider’s terms and policies.

## 6. DATA LOCATION & RETENTION

**Data Location.** Rise operates globally and your personal data may be maintained, processed or stored by us and our authorized Service Providers in multiple locations, such as Israel, the United States, Europe, or other jurisdictions, as reasonably necessary for the proper performance and delivery of the Website, or as may be required by law.

While privacy laws may vary between jurisdictions, Rise and its Service Providers are each committed to protect personal data in accordance with this Policy, reasonable and customary industry standards, and such appropriate lawful mechanisms and contractual terms requiring adequate data protection, regardless of any lesser legal requirements that may apply in the jurisdiction to which such data is transferred.

**Data Retention.** We will retain your personal data for as long as it is reasonably necessary for us to maintain and expand our relationship and provide you with Website or other services; in order to comply with our legal and contractual obligations; or to protect ourselves from any potential disputes (i.e., as required by laws applicable to financial solutions, log-keeping, records and bookkeeping, and in order to have proof and evidence concerning our relationship, should any legal issues arise following your discontinuance of use), all in accordance with our contractual terms and data retention policy.

Please note that except as required by applicable law or our specific agreements with you (if any), we will not be obligated to retain your personal data for any particular period, and we are free to securely delete it or restrict access to it for any reason and at any time, with or without notice to you. If you have any questions about our data retention policy, please contact us by e-mail at [support@risecodes.com](mailto:support@risecodes.com).

## 7. DATA SUBJECT RIGHTS

Please send us an email to: [support@risecodes.com](mailto:support@risecodes.com) if you wish to exercise your privacy rights under any applicable law, including the EU or UK General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA), the California Privacy Rights Act (CPRA), or the Virginia Consumer Data Protection Act (VCDPA). Such rights may include, to the extent applicable, the right to know/request access to (specific pieces of personal information collected; categories of personal information collected; categories of sources from whom the personal information was collected; purpose of collecting personal data; and categories of third parties with whom we have shared personal data), to request rectification or erasure of your personal data held with us, your right to restrict or object to such personal information's processing, or to port such personal information or the right to equal services and prices (e.g., freedom from discrimination) (each to the extent available to you under the laws which apply to you). If you are a GDPR-protected individual, you also have the right to lodge a complaint with the relevant supervisory authority in the EU or the UK, as applicable.

Subject to applicable privacy laws, we will make reasonable efforts to accommodate your request. Please note, that before we take any action, we may ask you to provide us additional information, including personal data, in order to authenticate and validate your identity and process your request.

## 8. COOKIES AND DATA COLLECTION TECHNOLOGIES

We and our third party Service Providers use cookies and other similar technologies ("Cookies") in order for us to provide our service and ensure that it performs as it should, to analyze our performance and marketing.

**Cookies.** cookies are small text files that are stored through the browser on your computer or mobile device (for example, Google Chrome or Safari) when you visit a website. Some cookies are removed when you close your browser – these are "session cookies". Some last for longer periods and are called "persistent cookies". We use both types of cookies to facilitate the use of the Website's features. Whilst we do not change our practices in response to a "Do Not Track" signal in the HTTP header from a browser or mobile application, you can manage your cookies preferences, including whether or not to accept them and how to remove them, through your browser settings. Please bear in mind that disabling cookies may complicate or even prevent you from using the Website. For more information regarding cookies, you may find the following websites useful: [www.allaboutcookies.org](http://www.allaboutcookies.org), [www.youronlinechoices.co.uk](http://www.youronlinechoices.co.uk).

Google Analytics. We use Google Analytics to collect information about the use of our Website. Google Analytics collects information such as how often you visit the Website, which pages you visited when doing so, and which other sites you used prior to coming to ours. We do not merge the information collected through the use of Google Analytics with other personally identifiable data. Google's ability to use and share information collected by Google Analytics about your visits to and use of the Website is restricted by the [Google Analytics Terms of Service](#) and the [Google Privacy Policy](#). You can learn more about how Google collects and processes data specifically in connection with Google Analytics by pressing [here](#). Further information about your option to opt-out of these analytics services is available [here](#).

In addition, we use the following Cookies on our Website:

- Google tag manager and recaptcha which their privacy policy is available at: <http://www.google.com/intl/en/analytics/privacyoverview.html>;
- Zapier or/and Formtitan which their privacy policy is available at: <https://zapier.com/privacy/>  
[https://formtitan.com/TermsOfUse#privacy\\_policy](https://formtitan.com/TermsOfUse#privacy_policy);

- CookiePro which their privacy policy is available at: <https://www.onetrust.com/privacy-notice/>;
- EqualWeb which their privacy policy is available at: [https://www.equalweb.com/html5/?\\_id=8615&did=1116&G=](https://www.equalweb.com/html5/?_id=8615&did=1116&G=);
- WPML which their privacy policy is available at: <https://wpml.org/documentation/privacy-policy-and-gdpr-compliance/>.

## 9. SECURITY

We employ industry standard measures, procedures and policies to ensure the safety of our Visitor's personal data, and to prevent unauthorized use of any information. Please note that regardless of the measures and efforts taken by us, we cannot and do not guarantee the absolute protection and security of your information.

## 10. ADDITIONAL INFORMATION AND CONTACT DETAILS

**Updates to this Policy.** We may update this Privacy Policy from time to time. If we make any material changes, we may, in our sole good faith, notify you prior to the change either via email or on the homepage of the Website.

This Privacy Policy is written in the English language, and may be translated into other languages for your convenience. If a non-English version of this Privacy Policy conflicts with the English version, the English version shall prevail.

**Children.** You must be 13 or older to be able to use the Website. We do not knowingly collect personal data from children under the age of 13. If we learn that a personal under the age of 13 is using the Website or provided any data to us, we will attempt to prohibit and block such use and will make our best efforts to promptly delete any personal data stored with us with regard to such child. We may request additional information from you, including proof of age to be able to verify that minors under the age of 13 are not using the Website. If you believe that we might have any such data, please contact us via [support@risecodes.com](mailto:support@risecodes.com).

**External Links.** The Website may contain links to other websites or services. This Policy does not apply to such linked third-party websites and We are not responsible for such websites' or services' privacy practices. Please read the privacy policies of each website you visit, before providing any personal data.

**Requirements Under US States Privacy Laws.** This Privacy Policy describes the categories of personal information we may collect and the sources of such information (in Section 1 above), our retention (Section 6), and deletion (Section 7) practices. We also included information about how we may process your information (in Sections 2-8), which includes for "business purposes" under the California Consumer Privacy Act (CCPA)/California Privacy Rights Act (CPRA) and similar state laws, as applicable. We do not sell your personal information for the intents and purposes of the CCPA or CPRA. We may share (as such term is defined under the CPRA) personal information with third parties if we have an appropriate contractual terms with the business that controls the collection of the shared personal information. We may also disclose personal information with third parties that are authorized Service Providers or business partners (as described in Section 5) who have agreed to our contractual limitations as to their retention, use, and disclose of such personal information. You may also designate an authorized agent, in writing or through the power of attorney, to request to exercise your privacy rights on your behalf. The authorized agent may submit a request to exercise these rights by

emailing us via [support@risecodes.com](mailto:support@risecodes.com). We will not discriminate against you by withholding our services from you or providing a lower quality of service to you for requesting to exercise your rights under the law.

If you have any questions or would like to exercise your rights under any applicable US State privacy laws, you can contact us via [support@risecodes.com](mailto:support@risecodes.com).

**Questions, concerns or complaints.** If you have any questions about this Privacy Policy, or if you have any concerns regarding your personal data held with us, or if you wish to make a complaint about your personal data is being processed by us, please contact us at [support@risecodes.com](mailto:support@risecodes.com) . We will make reasonable attempt to reply within a reasonable timeframe.

## **11. REPRESENTATIVE FOR DATA SUBJECTS**

We value your privacy and your rights as a data subject and have therefore appointed Prighter Group with its local partners as our privacy representative and your point of contact for the following regions:

- United Kingdom (UK)
- European Union (EU)
- Switzerland

Prighter gives you an easy way to exercise your privacy-related rights (e.g. requests to access or erase personal data). If you want to contact us via our representative, Prighter or make use of your data subject rights, please visit the following website: <https://prighter.com/q/15149609149>