

PRIVACY POLICY

Privacy Policy

1. general

1.1. This policy is presented to users of the SmartGrade App and interface (hereinafter: the "App" or "Interface") operated by Dealor Ltd. Or other on her behalf (hereinafter: the Company).

1.2. The Company is committed to protecting personal information about users and their privacy, and is responsible for handling the personal data of users of the Site and The Application as part of the use of these channels.

1.3. In accordance with the provisions of the law – including regarding the protection of privacy and the protection of information, this policy details and describes the types of information collected by the Company regarding users, the scope and purpose of collecting, processing and using the data received in connection with the information, including its sharing with third parties.

1.4 The provisions of this policy are formulated in the masculine language for convenience only, but treat both sexes the same.

1.5 This policy is an integral part of the terms of use of the interface and app. In any case of contradiction between the two – on matters relating to the protection of privacy and the protection of information, the provisions of this policy will prevail.

1.6 Settings:

1.6.1. **User** – A private person, a resident of Israel over the age of 18 who uses the interface or app;

1.6.2. **Personal Information** – Any information regarding a person's private affairs or information about a person (except a corporation or a member of persons) is identified or identifiable between directly or with additional data held by the Company or accessed by the Company;

1.6.3. **App** - A SmartGrade widget that can be installed on Android or IOS operating systems or power management interface.

1.6.4. **Device** – An end device is remotely controlled by an interface or application over the Internet;

1.6.5. **Processing** – any action with respect to personal information, including collection, retention, organization, construction, storage, adaptation, modulation, retrieval, consultation, use, disclosure, transmission, distribution, accessibility, integration, combination, arrangement, deletion or destruction;

1.6.6. **Subject of Information** – User to which personal information relates;

1.6.7. **Business Partner** – Authorized Reseller or Authorized Distributor.

1.6.8. **Provides information** – a business partner or third party who provides personal information about an information subject to the company.

2. The owner of the

database The company serves as the owner of the personal information or has the personal database about the user.

The personal information about the users will be stored in the database registered in the company name.

Those with information in common and others (to the most relevant):

In circumstances in which the devices were purchased by the Company's business partners, these business partners may also serve as the database owner separately (as the case may be). It should be clarified that the manner in which that business partner uses and processes the personal information about the user is regulated under that business partner's privacy policy (to the extent that it exists). For the avoidance of doubt, the Company will not be liable, beyond what is set forth in this Policy, for the actions of a business partner who is not under its control concerning the use or processing of personal information.

3. Collection and processing of information The Company collects or receives personal information about the User at any time he uses

the Company's services or products, including the service channels, such as the Site and the Application or contacts her.

In addition, the Company may receive user information from third parties, such as from business partners. To the point where the information is provided to an information subject, he should make it his opinion that information about him is about to be provided to the company, as well as refer him to this policy.

A user who makes use of the Site and the Application consents to the provisions of this policy, and to the extent that he himself provided information on the site or application (or both) he declares and undertakes that:

(A) To the point of giving away the information on its own behalf, that (1) this information is correct, accurate and belonging to it; and (2) the personal information will be stored in the Company's database, and the Company will be entitled to use it, as well as transfer it to third parties acting on its behalf or in cooperation with it, based on the provisions of this policy.

(B) To the point that the information ethic does so for a third party– (1) is authorized and lawfully authorized to provide personal information about the information subject, and that the disclosure of the information does not infringe on any third party's rights, including its privacy; and (2) the subject of the other information has approved and given his express consent to the delivery of the information and the provisions of this Privacy Policy; (3) That this information is correct, accurate and belongs to the subject of the information.

The Company may collect and make use of personal information about the User for the purposes set forth below – subject to this Privacy Policy and the provisions of applicable law:

(a) providing the Services and Products to users;(b) statistical purposes related to the use of the Services and Products available to the User on the Site and Application;(c) improving, enriching or modifying the Website and Application;(d) analyzing and studying the behavior of electrical appliances connected to products, manner and frequency of their use ;(h) compliance with applicable law.

The Company undertakes to make use of the information and data in accordance with the provisions of this policy, and as long as there is a legal basis for such use. The legal bases by which the company may collect and process user information are the:

(A) The user agrees that the Company will collect and process personal information about him for one or more specific purposes. In such a case, where the legal basis is informed consent, the user may withdraw his consent by sending a message to the following e-mail address: info@dealor.co.il

The cancellation of prior consent may affect the Company's ability to provide any or all of the services and products offered by it as the Company intended to provide them. If so, the user will have no claim, demand or claim against the Company.

(B) the processing of the information is required for the purpose of maintaining a contract for which the user is a party or to take steps at his request prior to contracting (e.g., processing data for the purpose of approving a purchase by means of payment or completing an order);

(c) the existence of a legal obligation that requires the processing of information;

(d) fulfilling legitimate interests of the Company or a third party (for example, for the purpose of protecting against legal proceedings, collecting data for the purpose of identifying and preventing misuse of the Site or Application, improving and streamlining the Company's service), provided that this does not disproportionately infringe on users' rights.

A user may, at any time, contact the Company and object to the processing of the information for this purpose, and his request will be reviewed according to his circumstances – all as set forth in Section 14 of this Policy.

It should be emphasized that in any case, the use and processing of the information is subject to the relevant data protection or privacy laws.

The user is entitled to contact the Company, at any time, to receive details of the test carried out by it to determine the legal basis for collecting and processing the information, as set forth in this policy.

A factor on which the information was collected is required to be over the age of 18. A user whose age is lower is required to obtain the consent of his or her parents or guardian to collect and process the information in accordance with this policy. In the absence of such consent, the user is requested to discontinue the use of the website or application and the company will cease providing its products or services. The Company may ask each user to present a reference – to her satisfaction – in relation to his age.

The Company will retain the personal information about a user for the period of time necessary in order to realize the purposes of its use, as set forth in this Policy or for a maximum of the period of time required as stipulated in the applicable provisions of the law. In order to safeguard users' rights to privacy, the company conducts periodic examinations, in which it checks whether the information is still required.

4. **The information collected**

in accordance with the provisions of this Privacy Policy, the Company collects the following information from customers:

(a) **Personal data when registering for the app or website** or when the user is contacted by the Company through the Site– The Company will collect information about the User such as: name, e-mail address, mobile phone number, ID number, address and identifying information about the devices.) b) **Information collected about users' use of the Site and Application**– This information includes, but are not allowed, an IP address or other (UniqueID)to identify the devices used by the user of the website or app, the type of browser, device and operating systems through which surfers access the site or app, The user's access times and times to the website or application, the pages on the website or application browsed by the user, the searches carried out by the user on the website or application, the pages from which the user was referred, browsing patterns and other use of the site and application, reports of technical malfunctions and other technical information. c) Information collected as part of the acquisition of products or services from third parties who are business partners of **the Company**– a user who purchases services or products from third parties who are business partners, the Company will receive the user information provided by it to the third party.) d) **Device location data:** As part of the use of the app and website, to the point where this option is available and operating on the device, the Company may collect data about the location of the user's device for the purpose of providing location services and statistics on product usage. e) The payment method (credit card) data will not be stored in the company's databases and will not be provided to any third party.

5. **Failure to provide personal information to the Company in accordance with Section 11 of the Privacy Protection**

Law, 5741-1981, that no legal obligation applies to users to provide the Company with information or any other data, and that any information relating to the user is done on his own accord and in accordance with his free will.

However, in some cases, failure to provide personal information about a user will result in the Company not being able to provide that user with the service or product requested by that user or respond to the user's request (all, as the case may be).

PersonalizationThat the Company strives to present to its customers or potential customers content and offers that may be personally relevant to them, based on their personal preferences and needs.

6. **Links to other websites The website and app may include links to or from third-party websites or sources to which the user may access at his discretion.**

In the event of a request and access to these external sites, and since this policy does not apply to them– refer to the Terms of Use and Privacy Policy and note that any such third-party website or source may collect and use the User's personal data differently than set forth in this Policy. It is clarified that in these circumstances, the Company has no control over what is done in the framework of browsing, processing and shared with other parties, and accordingly the Company is not responsible for the manner in which the data is collected and used.

8. **Transfer of information to third parties** **The Company may share personal information** about the users with other companies in the Group in order to support the overall activity of the Company and the Group, and to the internal needs of the Group's companies.

In addition, the Company may transfer personal information to third parties as follows:

A. Data from services and suppliers that help a company provide services and products offered on the site and in the application. These services include: carriers, Internet companies, etc.;

B. Service providers and suppliers in cases of dispute, claim, claim, demand or legal proceedings that the Company is not a party to or in any other case where sharing the information with them will be necessary to safeguard the property or rights of the Company or any third party;

C. Authorities or governmental or public bodies for the purpose of fulfilling a legal obligation that applies to the Company or for the purpose of fulfilling or fulfilling judicial orders;

D. The company's business partners market or distribute the company's products and services – with the help of which the company is able to make its range of solutions and services accessible to a wide audience, or alternatively business partners whose products and products the company offers to its customers in order to expand its solutions – all within the framework of the website, application or otherwise.

The foregoing does not detract from the company's right to transfer information to third parties that does not identify the user by name and/or details of his identity directly, to the point that there is no limitation on this under applicable law.

In addition, the Company may share the information with a third party wishing to purchase the Company or another company in the Group or the assets of any of them (in whole or in part), subject to its commitment to securing the information at a level that will not be less than what is set forth in this policy.

9. **Transfer of information to other countries and international entities** **The user is aware that personal information about him may be transmitted outside the borders of the State of Israel, subject to the provisions of**

applicable law, for the purpose of maintaining, maintaining and processing it, and the user gives his full consent to this, by using the Website and the Application and providing personal information to the Company.

The Company will be entitled to transfer the personal information about the user outside the European Economic Area (i.e., non-EU companies other than Iceland, Liechtenstein and Norway) and to international organizations, entities or companies.

The Company will take the appropriate steps to ensure an adequate level of protection for personal information about users as set forth in this policy and as required by applicable law, including imposing contractual obligations on the recipients of the information for the purpose of maintaining the protection of the

information at the acceptable level, including the contractual provisions adopted by the Council of the European Union (European General Data Protection Regulation 679/2016).

10. **The company's**

cookies, like other companies, periodically use cookies on the site and in the app. The cookies are a string of letters or numbers used to track and store personal information about a web surfer. The cookies are installed on the user's device when accessible to the website or app, and that device is assigned an ID number on the company's systems.

The cookies files are used for the following purposes:

(a) improving user experiences during use of the Site and Application, including by tracking user activity patterns on the Site and maintaining their personal preferences;

(b) improving the activity of the site and the application to work more efficiently, inter alia by collecting statistical data regarding their use by users and users of the site – such as: the performance of the site, security, etc.;

(c) To display personalized advertisements to the User according to his usage habits on the Site and Application, on the websites of other suppliers or as received in other ways, all subject to law.

Sometimes, the company allows third parties to install cookies on a device that shares cookies, whether temporary or permanent, and these are used by the third parties in relation to websites, products or services offered by them. However, in any case, the information collected by the Company will not be shared with third parties without the user's consent.

The information accumulated in the cookies is encrypted by acceptable means and the company takes precautionary measures to ensure access to them and understand the information contained in them through the company's systems only.

The User acknowledges and agrees that when registering and using the Site, the Company may plant cookies on the user's computer as set forth in this section.

Restrict or disable the use of cookies – A user who wishes to restrict or disable the use of cookies at any time by changing browser settings.

Although the settings in each browser are different, changing the modify can be done by accessing the "Settings" or "Preferences" menu in the browser. For more information or help on the topic, you can use the "Help" app that appears in the browser menu.

Note that in the event of the cookies being disabling, some features of the site and app may not work at all or as expected.

11. **Use of social additives as part of a social network**

Marketing information on the Site may be displayed in third-party content and the user's use of third-party content is subject to that third party's terms of use and privacy

policy. Any use of third-party content, including any entry of the User to third-party websites by referral or advertisement on the Site and Application, will be made at the sole responsibility of the User and the User will have no claim, claim or demand against the Company in connection with this, including but not derogating, for any damage, direct or indirect, arising from such use or entry, due to violation of privacy, any collection of information or use therein by third parties.

12. **Information security**

Communications networks, computers, servers, and websites are vulnerable to attacks and attempted hacking by various parties.

Therefore, the Company takes technical and organizational security measures in order to maintain the privacy of the information stored as part of the use of the Site and the Application, while implementing and implementing information security systems and procedures, while taking acceptable precautions and using advanced security technologies, in order to protect the confidentiality of the data provided to it by users of the site and the application and its users. In addition, in circumstances in which the information is transferred to third parties, the Company also acts to require them to take necessary technical and organizational measures in order for the level of information protection not to decrease.

However, it should be emphasized that it is not possible to guarantee, and in any case the Company does not undertake, that the Site and the Application will be routinely conducted without interruption and malfunction or will be completely immune from unauthorized access or improper penetration of the Company's databases, or in cases arising from force majeure.

By browsing the Site or using the Application (as the case may be), and providing personal information, the User releases the Company and anyone acting on its behalf from liability for any damage caused to the User or anyone acting on his behalf due to attacks, attempted hacking and intrusions into such information and waives any claim against the Company or anyone acting on its behalf in connection with it, including due to violation of privacy.

14. User rights regarding information about which the user is entitled to the following rights in relation to personal hands accrued as part of the use of the Website or Application (or both), in accordance with the Privacy

Protection Law, 5741-1981 and the regulations enacted by virtue of it:

A. Right of reference – A user is entitled to review the information about him or her in a database and to receive a copy of the aforementioned personal information. (b) the purposes of the processing of personal information about it; (c) the parties that received or receive personal information about him; (d) as far as the information comes from an external source – information relating to the source of the information; (E) The steps taken to secure the information.

B. Right to correct personal information– To the point that it is inaccurate or incomplete, a user may request that the Company make corrections or completions of the information (as the case may be).

C. Right to delete personal information– A user may request that personal information about him or her be deleted by the Company, provided that there are no legal reasons justifying the retention and processing of personal information about him or when they are required to establish an application or protection against lawsuits.

D. Right to restrict the use of personal information– A user is entitled to demand that restrictions be placed on the use of personal information about him by the Company, provided that there are no legal reasons justifying the retention and processing of personal information about him or when these are required to establish an application or protection against lawsuits.

E. The right to object to the use of personal information– a user may, at any time, object for reasons related to him, the processing of personal information about him, provided that there are no legal reasons justifying the retention and processing of personal information about him or when these are necessary for the purpose of establishing an application or protection against lawsuits.

F. Right to mobility of personal information– A user may receive personal information about him from the Company, As provided to the Company, in a structured format, accepted and readable by a machine, and to transfer the said information to another data server.

G. Right to opt-out – A user may at any time withdraw his consent to the Company's use of personal information about him, from the moment of request onwards, provided that it does not detract from or deny the legality of the use of the information prior to the cancellation.

H. The right to contact the Company– In the event of a question, clarification or complaint regarding personal information or this policy, a user may contact the Company as set forth in this policy. In the event of an application to exercise any of these rights, the Company will act to respond to the request without delay.

This does not infringe on the company's right to keep a copy of the personal information in accordance with the provisions of the applicable law in the field of privacy protection.

The Company may require identifying information or other information from the applicant, inter alia, to ensure that it does not provide personal information about a user to third parties.

Requests or inquiries under this section should be directed to the following e-mail address: privacy@dealor.co.il

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The Company may change from time to time the provisions of this policy, including to accommodate changes in the services provided by the relevant company or in response to current legal requirements. In any such case, the Company will announce these changes by publishing the updated policy on the website and application.

Without derogating from the aforesaid, in cases of material change in the policy, the Company will make an effort to inform the users by posting an open notice on the website and application, and subject to the provisions of the law – to obtain the user's consent for such a material change. Unless, otherwise stated, all changes will take effect on the day of publication on the relevant website or app. The Company recommends that every user review the privacy policy provisions on each access to the website or application in order to review changes that have occurred, to the

most part, in the Privacy Policy. The continued use of the Site after such a change will constitute evidence of your approval regarding the acceptance of the changes.

The binding formula of the Privacy Policy is the one that will appear from time to time on the website and app and for which the date of the last update will be specified.

Contact -

For any questions or clarifications regarding data protection and information, you can contact us by one of the following means:

Phone: 08-9724000

Email: info@dealor.co.il

Fax: 08-9724040

This policy is updated to: June 1st, 2021.
