

ARPEELY PRIVACY AND DATA PROTECTION POLICY AND NOTICE

Arpeely Ltd. and its affiliates (“Arpeely”, “we”, “our”, and their cognates) respects the privacy of its customers, end-users, vendors and various websites visitors, and others of whom we collect information, and is committed to protecting the personal information you may share with us (these and any others with respect to whom we collect personal data, shall collectively be referred to as “user”, “customer” or “you” or “Data Subjects”).

Arpeely provides user acquisition services to its customers, typically media advertisers, through its demand-side platform (the “Services”). This policy and notice (the “Privacy Policy”) explain the types of information we may collect from you, that we may receive about you or that you may provide in the course of your interest or others’ in our Services, business transactions, conferences or when you use our platform or visit our websites. We are transparent about our practices regarding the information we collect, use, maintain and process and describe our practices in this policy and notice. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

For the purposes of EU General Data Protection Regulation (the “GDPR”), US State privacy laws and other applicable data protection and privacy laws, Arpeely is usually a Controller (‘owner’, ‘business’ etc.) in relation to the personal data of our customers and prospective customers, website visitors, and end user data processed by us for our own purposes.

WHEN PROCESSING END-USER DATA ON THE CUSTOMERS’ BEHALF, SUCH AS WHEN INFORMATION IS PROVIDED TO US BY OUR CUSTOMER OR ON THEIR INSTRUCTION, WE ACT AS A PROCESSOR. IN THESE INSTANCES, THE CUSTOMER SERVES AS THE CONTROLLER, AND THEIR PRIVACY POLICY GOVERNS THE PROCESSING OF YOUR DATA. AS A PROCESSOR, WE FOLLOW THEIR INSTRUCTIONS, MEANING OUR OWN PRIVACY POLICY DOES NOT APPLY TO THIS DATA.

1. WHICH INFORMATION MAY WE COLLECT?

Summary: we collect various categories of personal data in order to meet our contractual obligations, and also to meet various legitimate interests, such as optimisation, fraud prevention and marketing.

We collect data about you in connection with your transactions with us, or when processing data for our customers. We also collect data about our website visitors. One type of data collected is non-identifiable and anonymous information (“non-personal data”). We also collect several categories of personal data (“Personal Data”), as described below.

Personal Data which is being gathered consists of any details which are personally identifiable and which are provided consciously and voluntarily by you, or by an organization you represent or are associated with or through your use of our website and registration to and use of our Services, by email, or other ways in which you communicate and interact with us. This generally

includes your name (first and last), email address, phone number, postal address, position and organization name and other information you may choose to provide to Arpeely directly and willingly through your use of our platform. Additionally, we may obtain data related to the geographic location of your laptop, mobile device or other digital device on which the Arpeely website or platform are used.

By contacting us or submitting requests for information or support via the website, email etc., Arpeely will collect details, including also your name, phone number and personal or company email you provided, country and other information provided by you. Arpeely may use this information to offer Arpeely's Services and support.

You do not have any legal obligation to provide any information to Arpeely, however, we require certain information in order to perform contracts, or to provide any services. If you choose not to provide us with certain information, then we may not be able to provide you or your organization with some or all of the services.

We collect data through our customers and media exchanges and advertising partners as part of bid processes for user acquisition. This may include bid request data, end-user device information, and impression data. As noted above, this data is typically processed on behalf of our customers, where we act as a data processor.

2. HOW DO WE COLLECT PERSONAL DATA OF YOURS ON ARPEELY SERVICES?

Summary: we collect Personal Data when you or your organization send it to us, or when a vendor, distributor or other business partner, sends it to us so; we collect Personal Data through our website and Services, and through our interactions with you.

We collect Personal Data required to provide Services when you register interest, or when you provide us such information by entering it manually or automatically, or through your use of our facilities and Services, in the course of preparing a contract, or otherwise in engaging with us. We also may collect Personal Data when you call us for support, in which case we collect the information you provide us.

We also collect Personal Data through your use of our website and when we receive it from media exchanges or advertising partners as part of our Services. In other words, when you are visiting our website or other websites and pages, we are aware of it and may gather, collect and record the information relating to such usage, choices made by you and feedback you provide, either independently or through the help of third-party services as detailed below. This includes feedback provided by you, information about your interactions with the website, and technical information and behavioral information such as the user's Internet protocol (IP) address used to connect your device to the Internet, your uniform resource locators (URL), operating system, type of browser, browser plug-in types and versions, screen resolution, time zone setting, the user's 'clickstream' on the website or platform, the period of time the user visited the platform, methods used to browse away from a page. We likewise may place cookies on your browsing devices (see 'Cookies' section below).

3. WHAT ARE THE PURPOSES OF PERSONAL DATA WE COLLECT?

Summary: we process Personal Data to meet our obligations, protect our rights, and manage our business.

We will use Personal Data to provide and improve our services to our customers and others and meet our contractual, ethical and legal obligations. All Personal Data will remain accurate, complete and relevant for the stated purposes for which it was processed, including for example:

Processing which is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract:

- Carrying out our obligations arising from any contracts entered into between you or your employer or organization and Arpeely or Arpeely's customers and/or any contracts entered into with Arpeely and to provide you with the information, products, support and services that you request from Arpeely and its customers;
- Verifying and carrying out financial transactions in relation to payments you make in connection with the Services

Processing which is necessary for the purposes of the legitimate interests pursued by Arpeely or by a third party of providing an efficient and wide-ranging service to customers:

- Notifying you about changes to our service;
- Collecting data from various publicly available sources, including commercially licensed databases to develop and improve our Services;
- Contacting you to give you commercial and marketing information about events or promotions or additional services offered by Arpeely which may be of interest to you, including in other locations;
- Soliciting feedback in connection with the services;
- Tracking use of Arpeely Services to enable us to optimize them.
- For security purposes and to identify and authenticate your access to the Services.

Processing which is necessary for compliance with a legal obligation to which Arpeely is subject:

- Compliance and audit purposes, such as meeting our reporting obligations in our various jurisdictions, anti-money laundering, and for crime prevention and prosecution in so far as it relates to our staff, customers, facilities etc;
- If necessary, we will use Personal Data to enforce our terms, policies and legal agreements, to comply with court orders and warrants and assist law enforcement agencies as required by law, to collect debts, to prevent fraud, infringements, identity thefts and any other service misuse, and to take any action in any legal dispute and proceeding.

We aggregate and de-identify Personal Data (i.e., use your data in a way which no longer allows to identify you) to analyze and improve our Services, and to conduct research, and for other

similar purposes. We may share non-personal aggregated information with third parties, as described below.

4. SHARING DATA WITH THIRD PARTIES

Summary: we share Personal Data with our service providers, partners, and group companies, and authorities where required.

We transfer Personal Data to:

Third Parties. We transfer Personal Data to third parties in a variety of circumstances. We endeavor to ensure that these third parties use your information only to the extent necessary to perform their functions, and to have a contract in place with them to govern their processing on our behalf. These third parties include business partners, suppliers, affiliates, agents and/or sub-contractors for the performance of any contract we enter into with you. They assist us in providing the services we offer, processing transactions, fulfilling requests for information, receiving and sending communications, analyzing data, providing IT and other support services or in other tasks, from time to time. These third parties also include analytics and search engine providers that assist us in the improvement and optimization of our platform, website, and our marketing.

We periodically add and remove third party providers. At present services provided by third-party providers to whom we may transfer Personal Data include also the following:

- Website and platform analytics;
- Media exchanges and advertisement partners;
- Document management and sharing services;
- Customer ticketing and support;
- On-site and cloud-based database services;
- CRM software;
- Fraud detection and monitoring tools;
- Project management systems;
- Data security, data backup, and data access control systems;
- Our lawyers, accountants, and other standard business software and partners.

In addition, we will disclose your Personal Data to third parties if some or all of our companies or assets are acquired by a third party including by way of a merger, share acquisition, asset purchase or any similar transaction, in which case Personal Data will be one of the transferred assets. Likewise, we transfer Personal Data to third parties if we are under a duty to disclose or share your Personal Data in order to comply with any legal or audit or compliance obligation, in the course of any legal or regulatory proceeding or investigation, or in order to enforce or apply our terms and other agreements with you or with a third party; or to assert or protect the rights, property, or safety of Arpeely, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction and to prevent cybercrime.

For purposes of the California Consumer Privacy Act as amended by the CPRA (CCPA) or other US privacy state laws, Arpeely does not “sell” or “share” personal information, nor do we allow any personal information to be used by third parties for their own marketing. However, we use analytics tools and other technologies (as described above), which may be construed as a “sale” under CCPA to which you may opt- out of. For avoidance of doubt, Arpeely may transfer and disclose non-Personal Data to third parties at its own discretion.

5. WHERE DO WE STORE YOUR DATA?

Summary: we store your Personal Data across multiple locations globally

We store your Personal Data in databases owned or controlled by us, or processed by third parties on our behalf, by reputable cloud-service providers (see the following section regarding international transfers).

6. INTERNATIONAL DATA TRANSFERS

Summary: we transfer Personal Data within and to the EEA, USA, Israel and elsewhere, with appropriate safeguards in place.

Personal Data may be transferred to, and stored and processed at, a destination outside its origin. EU data may be transferred outside the European Economic Area (EEA). This includes transfer to Israel, a jurisdiction deemed adequate by the EU Commission, and to the USA, which may be deemed adequate under certain circumstances but not always. Where your Data is transferred outside of the EEA, we will take all steps reasonably necessary to ensure that your Data is subject to appropriate safeguards, including entering into contracts that require the recipients to adhere to data protection standards that are considered satisfactory under EU law and other applicable, and that it is treated securely and in accordance with this Privacy Policy. Transfers to Israel are made based on an adequacy ruling by the EU Commission. Transfers to the USA are made based either on an adequacy ruling to members of the data privacy framework, or based on the Standard Contractual Clauses published by the EU Commission. For more information about these safeguards, please contact us as set forth below.

We may transfer your Personal Data outside of the EEA, in order to:

- Store or backup the information;
- Enable us to provide you with the services and products and fulfill our contract with you;
- Fulfill any legal, audit, ethical or compliance obligations which require us to make that transfer;
- Facilitate the operation of our group businesses, where it is in our legitimate interests and we have concluded these are not overridden by your rights;
- To serve our customers across multiple jurisdictions.

7. DATA RETENTION

Arpeely will retain Personal Data it processes only for as long as required in our view, to provide the Services and as necessary to comply with our legal and other obligations, to resolve disputes

and to enforce agreements. We will also retain Personal Data to meet any audit, compliance and business best-practices. Personal Data with respect to which we are the processor will be deleted only on instruction of the controller (the media exchange or advertising partner, as appropriate), except where such data must be retained by us, as above.

Data that is no longer retained may be anonymized or deleted. Likewise, some metadata and statistical information concerning the use of our services are not subject to the deletion procedures in this policy and will be retained by Arpeely. We will not be able to identify you from this data. Some data may also be retained on our third-party service providers' servers until deleted in accordance with their privacy policy and their retention policy, and in our backups until overwritten.

8. SERVICES AND WEBSITE DATA COLLECTION AND COOKIES

Summary: with your consent, we place cookies on your device. You control our use of cookies through a cookie management tool on our website, or through your device and browser.

Arpeely uses cookies, pixel tags and other forms of identification and local storage (together referred to as "tags/files" hereunder) to distinguish you from other users of the website and of websites of our network. This helps us to provide you with a good user-experience when you browse the website and websites of our network and also allows us to improve our website and our services.

In many cases, these tags/files lead to the use of your device's processing or storage capabilities. Some of these tags/files are set by Arpeely itself, others by third parties; some only last as long as your browser session, while others can stay active on your device for a longer period of time.

These tags/files can fall into several categories: (i) those that are necessary for functionality or services that you request or for the transmission of communications (functionality tags/files); (ii) those that we use to carry out website performance and audience metrics (analytics tags/files) and (iii) the rest (tracking across a network of other websites, advertising, etc.) (other tags/files).

Internet browsers allow you to change your cookie settings, for example to block certain kinds of cookies or files. You can therefore block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies, you may not be able to access all or parts of the website, due to the fact that some may be functionality cookies. For further information about deleting or blocking cookies, please visit: <https://www.aboutcookies.org/how-to-delete-cookies/>

Functionality and analytical tags/files do not require your consent. For other tags/files, however, we request your consent before placing them on your device. You can allow cookies in your browser settings and using our website cookie management tool.

To consult the list of cookies which we use on our website, please check your browser's settings. Instructions: <https://www.wikihow.com/View-Cookies>

9. SECURITY AND STORAGE OF INFORMATION

We take great care in implementing, enforcing and maintaining the security of the Personal Data we process. Arpeely implements, enforces and maintains security measures, technologies and policies to prevent the unauthorized or accidental access to or destruction, loss, modification, use or disclosure of Personal Data. We likewise take steps to monitor compliance of such policies on an ongoing basis. Where we deem it necessary in light of the nature of the data in question and the risks to data subjects, we may encrypt data. Likewise, we take industry standard steps to ensure our website and services are safe.

Note however, that no data security measures are perfect or impenetrable, and we cannot guarantee that unauthorized access, leaks, viruses and other data security breaches will never occur.

Within Arpeely, we endeavor to limit access to Personal Data to those of our personnel who: (i) require access in order for Arpeely to fulfill its obligations, including also under its agreements, and as described in this Privacy Policy, and (ii) have been appropriately and periodically trained with respect to the requirements applicable to the processing, care and handling of the Personal Data, and (iii) are under confidentiality obligations as may be required under applicable law.

Arpeely shall act in accordance with its policies and with applicable law to promptly notify the relevant authorities and data subjects in the event that any Personal Data processed by Arpeely is lost, stolen, or where there has been any unauthorized access to it, all in accordance with applicable law and on the instructions of qualified authority. Arpeely shall promptly take reasonable remedial measures.

10. DATA SUBJECT RIGHTS

Summary: depending on the law that applies to your Personal Data, you may have various data subject rights, such as rights to access, erase, and correct Personal Data, and information rights. We will respect any lawful request to exercise those rights.

Data subjects with respect to whose data GDPR, CCPA, US state privacy laws or other data protection or privacy laws apply, have rights under applicable laws, including, in different circumstances, rights to data portability, rights to access data, rectify data, object to processing, and erase data. It is clarified for the removal of doubt, that where Personal Data is provided by a customer being the data subject's employer or data controller, such data subject rights will have to be effected through that customer, the data subject's employer or supplier. In addition, data subject rights cannot be exercised in a manner inconsistent with the rights of Arpeely employees and staff, with Arpeely proprietary rights, and third-party rights. As such, job references, reviews, internal notes and assessments, documents and notes including proprietary information or forms of intellectual property, cannot be accessed or erased or rectified by data subjects. In addition, these rights may not be exercisable where they relate to data that is not in a structured form, for example emails, or where other exemptions apply. If processing occurs based on consent, data subjects have a right to withdraw their consent.

A data subject who wishes to modify, delete or retrieve their Personal Data, including from our database, or to opt-out from using data to train our models, may do so by contacting Arpeely

(privacy@arpeely.com). Note that Arpeely may have to undertake a process to identify a data subject exercising their rights. Arpeely may keep details of such rights exercised for its own compliance and audit requirements. Please note that Personal Data may be either deleted or retained in an aggregated manner without being linked to any identifiers or Personal Data, depending on technical commercial capability. Such information may continue to be used by Arpeely.

Data subjects in the EU, and in other locations have the right to lodge a complaint, with a data protection supervisory authority in the place of their habitual residence. If the supervisory authority fails to deal with a complaint, you may have the right to an effective judicial remedy.

11. GENERAL

Summary: depending on the law that applies to your Personal Data, you may have various data subject rights, such as rights to access, erase, and correct Personal Data, and information rights. We will respect any lawful request to exercise those rights.

Minors. We do not knowingly collect or solicit information or data from or about children under the age of 16 or knowingly allow children under the age of 16 to register for Arpeely services. If you are under 16, do not register or attempt to register for any of the Arpeely service or send any information about yourself to us. If we learn that we have collected or have been sent Personal Data from a child under the age of 16 unlawfully, we will delete that Personal Data as soon as reasonably practicable without any liability to Arpeely. If you believe that we might have collected or been sent information from a minor under the age of 16, please contact us at: privacy@arpeely.com, as soon as possible.

Changes to this Privacy Policy. The terms of this Privacy Policy will govern the use of the Services, website, and any information collected in connection with them. Arpeely may amend or update this Privacy Policy from time to time. The most current version of this Privacy Policy will be available at: www.arpeely.com/privacy Changes to this Privacy Policy are effective as of the stated “Last Revised” date and your continued use of our services will constitute your active acceptance of the changes to and terms of the Privacy Policy.

Arpeely aims to process only adequate, accurate and relevant data limited to the needs and purposes for which it is gathered. Note that due to the nature of the Services we cannot guarantee the accuracy of the output of the Services. You may request correction or removal of your data by reaching out to us at: privacy@arpeely.com.

Arpeely aims to store data for the time period necessary to fulfill the purpose for which the data is gathered. We only collect data in connection with a specific lawful purpose and only processes data in accordance with this Privacy Policy. Our policies and practices are constantly evolving and improving, and we invite any suggestions for improvements, questions, complaints or comments concerning this Privacy Policy, you are welcome to contact us (details below) and we will make an effort to reply within a reasonable time frame.

Arpeely’s data protection officer (DPO) may be contacted at: privacy@arpeely.com

Our article 27 GDPR EU Representative is MyEDPO Limited, available at info@myedpo.com

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