

# AVT Ltd. Privacy Policy

Effective May 31<sup>st</sup>, 2020

Version 2.1

This Privacy Policy explains how we handle the Personal Data provided to us on websites, mobile sites, mobile applications, and other digital services and products as well as offline controlled by AVT Ltd, [6 Hanagar Street, Hod HaSharon 4527703, Israel, or any affiliate doing business as AVT Ltd, that link to this Privacy Policy (collectively, "AVT Ltd Sites = www.avt-inc.com"). AVT Ltd is the data controller for the processing of Personal Data under applicable law.

This Privacy Policy does not apply to AVT Ltd Sites that do not link to this Privacy Policy or to third-party Web sites to which AVT Ltd Sites may link.

## Types of Information We Collect

The types of Personal Data that we may collect while you use the AVT Ltd Sites are described in this section and include both information that you provide to us and information that we collect automatically when you use the AVT Ltd Sites.

For purposes of this Privacy Policy, "**Personal Data**" (or also called "**Personal Information**") means information that identifies you or that could reasonably be used to identify you. Examples of Personal Data include name, address, telephone number, and email address.

## Information You Provide

You do not have to register for a service or program to receive much of the information available through AVT Ltd Sites. However, some of our content is available only to registered or identified users and will require you to set up a profile or provide specific information about yourself in order to provide you the service.

## **Personal Data You Provide When Visiting AVT Ltd Sites**

AVT Ltd collects Personal Data that you provide on AVT Ltd Sites. You may do this when purchasing a product, to receive marketing products and information, contact AVT Ltd customer service, or respond to AVT Ltd questionnaires or surveys. Such data includes:

- Contact Information such as your name, address, phone number, or email address
- Registration Information such as your username and password
- Remuneration information when you provide a service to AVT Ltd
- Employment, education and other background information when you inquire about employment with AVT Ltd
- Payment information (such as banking information, payment card number, expiration date, delivery address, and billing address)
- Content you may provide (for example, when you complete our Online Contact Form or submit other information).

## **Personal Data You Share During Other Interactions with AVT Ltd**

You may contact AVT Ltd to ask questions, discuss your concerns, or report issues regarding our products. If you communicate with or request information from AVT Ltd, you may be prompted to provide your contact information as well as any Personal Data that is relevant to your request. This information includes: [contact information, market segment related information, etc]

## **Information That May Be Collected Automatically**

When you use the AVT Ltd Sites, we also may collect certain usage and device information automatically as described below. Your IP address and non-identifying information about your use of AVT Ltd Sites may be collected automatically using tracking technologies, such as cookies. This information includes: device and advertising identifiers, browser type, operating system, Internet service provider, pages you visit before and after using the Site, the date and time of your visit, information about the links you click and pages you view within the Site, and other standard server log information. Your website browser software can be set to reject all cookies; however, cookies can allow you to take advantage of some of the site's essential features so they may not work if you reject cookies.

### **IP Address**

We may record the Internet Protocol ("IP") address of your computer or other electronic device when you visit the AVT Ltd Sites. An IP address identifies the electronic device you use to access the Sites, which allows us to maintain communication with your computer as you move about AVT Ltd Sites and to customize content.

### **Cookies and Other Tracking Technologies**

We also collect information about your use of AVT Ltd Sites through tracking technologies such as cookies and web beacons. A "cookie" is a unique numeric code that is transferred to your computer to track your interests and preferences and to recognize you as a return visitor. A "Web beacon" is a transparent graphic image placed on a Web site, e-mail or advertisement that enables the monitoring of things such as user activity and site traffic. These technologies help remember your preferences and allow us to bring you the content and features that are likely to be of greatest interest to you on the basis of "clickstream" data that shows your previous activities on AVT Ltd Sites. AVT Ltd Sites utilize both Google Analytics for tracking purposes.

We may share information about your use of AVT Ltd Sites with service providers who assist us with personalizing and delivering online marketing and advertising. We utilize Google Display Advertising (such as Retargeting with Google Analytics, Google Display Network Impression Reporting, DoubleClick Campaign Manager integration, and Google Analytics Demographics and Interest Reporting) to (1) show you our ads on other websites based on your prior visits to AVT Ltd Sites, and (2) better understand our ad impressions and use of ad services. In connection with the Google Analytics Demographics and Interest Reporting service, we may use data from Google's interest-based advertising or third-party audience data (such as age, gender and interests) with Google Analytics to understand and improve our marketing campaigns and Site content.

Some of our online advertising takes place through Google Display Advertising. As part of this program, we use Google Analytics features such as Retargeting. In connection with that feature and others offered by ad networks, we and the operators of ad networks, including Google, may use third-party cookies (such as the DoubleClick cookie) – and in some cases first-party cookies (such as the Google Analytics cookie) – to inform,

optimize and serve ads across the Internet, based on a user's past visits to AVT Ltd Sites. We also may show you ads from some of our affiliated companies when you visit AVT Ltd Sites.

When we disclose data for business purposes as discussed above, we disclose the categories of data listed above in Types of Information We Collect.

You can opt out of Google Ads by visiting <http://www.google.com/ads/preferences>. If you do not want your data used by Google Analytics, you can install the Google Analytics opt-out browser add-on at the [Google Analytics opt-out page](#).

To learn more about cookies and other tracking technologies, including how to disable them, please visit <http://www.allaboutcookies.org/>. Please note that some cookies are essential to the functioning of our Sites and deleting or disabling them will reduce the site's functionality.

## **Mobile Tracking**

Some AVT Ltd Sites are available either as mobile applications or mobile sites that you can use on your mobile device. If you use a mobile device to access and use the AVT Ltd Sites, we may collect the following mobile-specific information in addition to the other information described above: device or advertising ID, device type, hardware type, media access control ("MAC") address, international mobile equipment identity ("IMEI"), the version of your mobile operating system, the platform used to access or download the AVT Ltd Site (e.g., Apple, Google, Amazon, Windows), location information and usage information about your device and your use of the AVT Ltd Sites.

## **Information Collected from Other Sources**

We may combine information about you from AVT Ltd Sites with information that you provide offline, for the purposes specified in this notice. Any Personal Data that we obtain offline from you or others will be processed in compliance with notice requirements and other applicable law.

## **How We Use Your Information**

We use your Personal Data to provide you the product and services you request, communicate with you, improve your experience on the AVT Ltd Sites, generally improve our products and services and for other internal business purposes, including detecting security incidents, debugging to identify and repair errors that impair existing functionality, performing services on our behalf or that you request (such as serving online marketing and advertising), and fulfilling transactions. These uses may also include the recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of Personal Data. The Personal Data we collect about you will be retained only for so long as reasonably necessary for the purposes set out above and in accordance with applicable laws.

## **Providing Product and Services You Request**

If you choose to purchase a product or receive our services, we use the Personal Data that you provide through AVT Ltd Sites to manage your orders and invoices, to process payments, to respond to your questions, provide you the services you request and offer an optimal customer experience.

## **Marketing**

You may also receive marketing information from AVT Ltd and related affiliates, such as offers regarding AVT Ltd related products or services, invitations to participate in surveys about our products, or notifications about special promotions. In such cases, we will use your contact and other Personal Data to send you marketing information.

## **Customized User Experiences**

The Personal Data that you provide may be used to create customized offers, information, or services tailored to your interests and preferences. Also, we may use your IP address and the data that we obtain automatically through the use of cookies or similar tracking technologies to make our AVT Ltd Sites easier to use and navigate as well as to personalize the content provided on AVT Ltd Sites by anticipating the information and services that may be of interest to you.

## **Business and Product Improvement**

In order to discover new facts that could help AVT Ltd better understand customer needs and help improve, develop, and evaluate product, services, materials, and programs. AVT Ltd analyzes the information that you have provided. For these purposes AVT Ltd does not use information that can directly identify you.

## **Site Analytics and Improvement**

We may use the information that you provide and the information we collect automatically about your use of the AVT Ltd Sites to monitor user traffic patterns and preferences for site improvement, analytics and optimization.

## **Legal Basis for Processing**

Consistent with applicable law, AVT Ltd must have a legal basis to process your Personal Data. The legal basis that applies in an instance will depend on which of the specific purposes described above AVT Ltd is processing your Personal Data:

- In certain cases, and where required by applicable law, AVT Ltd may ask for your consent to collect and process your Personal Data. Should you choose to provide your consent, you may later withdraw your consent by contacting us as described in the “Your Privacy Choices” section. Please note that the withdrawal of consent will not affect processing which has already occurred.
- In other instances, the processing of your Personal Data may be necessary in order to comply with an applicable law or regulation or for the performance of a contract to which you are subject. You may not be able to opt-out of this processing, or your choice to opt-out may impact our ability to perform a contractual obligation otherwise owed to you.
- In still other instances, AVT Ltd may process your Personal Data based on AVT Ltd’s legitimate interests in communicating with you about our products and services, and about scientific research and educational opportunities. You have the right to opt-out of all such processing of your Personal Data. You may do so by contacting us as described in the “Your Privacy Choices” section.

## **Information We Share**

We may share information about your use of AVT Ltd Sites for certain business purposes, as follows:

### **Third-Party Advertising and Online Behavioral Advertising**

You may be provided with online advertisements of AVT Ltd products and services on third-party websites and mobile services that are tailored to you, for example, on the basis of information that you provide to AVT Ltd or a third-party website you are visiting, or of your browsing activity, purchases, or interests. These types of tailored online advertisements may come through several sources, such as the following:

- We may share with our advertising service providers your non-identifying information that we have obtained from cookies and other tracking technologies on our AVT Ltd Sites.
- Some AVT Ltd Sites participate in online behavioral advertising (this is also sometimes called re-target advertising or interest-based advertising). You can identify these sites by the “Advertising Choices” link in the footer. Our advertising network partners may place and use cookies on AVT Ltd Web sites and on other third-party Web sites to collect information about your activities in order to provide you with online advertisements that are based on your interests. When a AVT Ltd online behavioral advertisement is delivered to you, you will see an “Ad Choices” icon. Clicking on the icon or link will take you to a Web site where you can manage or opt out of the use of data about your browsing history that is used for the delivery of online behavioral advertisements. If you opt out, you may still see advertisements online, including advertisements from AVT Ltd that are based on other information (e.g., based on the content of the page being viewed rather than your prior clickstream activity). In some cases, data may still be collected about your browsing activity by these third-party advertisers, but they will not use this data to deliver advertisements that are based on your past online browsing behavior.
- Some Web browsers may transmit “do-not-track” signals to Web sites with which the browser communicates. As of the Effective Date of this Privacy Policy, an industry standard has not yet been established on how to respond to these signals. Therefore, AVT Ltd does not currently respond to these signals. As discussed above, you can opt-out from advertisers that use your browsing history to deliver online behavioral advertisements by visiting [adchoices](#).

### **Affiliates, Vendors and Suppliers**

We have relationships with suppliers and affiliated companies, who help us operate our business and for whom it may be necessary to have access to your Personal Data in the course of providing services to AVT Ltd. We require these parties to use your Personal Data in accordance with applicable law and reasonable privacy protections, and we do not share Personal Data from countries that require consent, unless consent has been obtained in advance to sharing with related affiliates.

During the last 12 months:

- We have shared with affiliates the following categories of Personal Data specified in the California Consumer Privacy Act (CCPA): personal identifiers, characteristics of protected classifications, commercial information, and professional or employment-related information.
- We have shared Personal Data (which may be in any CCPA category) with service providers for business purposes.

You can find all related [affiliates here](#).

### **Co-branded Sites**

We may partner with other companies to provide you with content or services on a joint or “co-branded” basis. At a co-branded site, you will see both the AVT Ltd logo and the logo of the co-branding partner displayed on your screen. You should read the individual privacy policies of our co-branding partners, as they may differ in some respects from ours. Reading these policies will help you to make an informed decision about whether to provide your information to a given site.

## **Product Reports**

If you contact AVT Ltd regarding your experience in using one of our products, we may use the information that you provide in submitting reports to the designated government regulatory authority, as required of us by law.

## **Legal Rights and Obligations**

In certain limited circumstances, AVT Ltd may need to disclose your Personal Data in order to comply with a legal obligation or demand, such as to comply with reporting obligations to our governing regulatory authorities regarding the safety of our products, or in connection with the sale or transfer of one of our product lines or divisions, which includes the services provided through one or more of the AVT Ltd Sites. In such instances, we will take measures to protect your Personal Data to the extent possible. We also reserve the right to use Personal Data to investigate and prosecute users who violate our rules or who engage in behavior that is illegal or harmful to others or to others’ property.

## **Change in Organization**

In the event AVT Ltd decides to reorganize or divest our business through sale, merger, or acquisition, AVT Ltd may share Personal Data about you with actual or prospective purchasers. We will require any actual or prospective purchasers to treat this Personal Data in a manner consistent with this policy.

## **Children Privacy**

AVT Ltd does not knowingly collect or use any Personal Data directly from children on AVT Ltd Sites (We define “children” as minors younger than 18). We do not knowingly allow children to order our products, to communicate with us, or to use any of our online services. If you are a parent and become aware that your child has provided us with information, please contact us using one of the methods specified below, and we will work with you to address this issue.

## **Your Privacy Choices**

You have the right to be informed about our data practices, as well as about entities with which we have shared your Personal Data and the possibility of denying consent and the consequences of such denial. You also have the right to see and get a copy of Personal Data about you that we maintain as well as to ask us to make corrections to inaccurate or incomplete Personal Data about you. You have the right to receive data you have provided to us in a machine-readable format and to transmit that data to another controller. You may also request the erasure of your Personal Data or the restriction of its processing, or object to the processing of Personal Data about you. We will comply with any other rights you may have under applicable law in addition to those listed above.

Consistent with applicable law, you also may request access to information about the categories of Personal Data we collect, the sources from which we obtain that Personal Data, why we collected it, and with whom we share it.

To seek access to Personal Data about you, exercise any other rights, to file a concern, complaint, or request for correction, or to opt-out of particular programs, please contact our Privacy Office [OpCos with a GDPR-mandated Data Protection Officer should substitute "Data Protection Officer"] by clicking on the "Contact Us" link on the AVT Ltd Site you are using, by using the AVT Ltd contact information on the AVT Ltd mobile application you are using, or by emailing [privacy@avt-inc.com](mailto:privacy@avt-inc.com). You may also send a letter to the following address:

AVT Ltd  
Attn: Data Protection Office/Privacy  
6 Hanagar Street  
Hod HaSharon 4527703  
Israel  
[[info@avt-inc.com](mailto:info@avt-inc.com)]

Many countries have a data protection authority to ensure that data protection law is followed. For more information about your privacy rights, or if you are not able to resolve a problem directly with us and wish to make a complaint, contact your local authority.

In all communications to AVT Ltd, please include your email address, the Web site address, mobile application, and/or the specific AVT Ltd product to which you provided Personal Data (e.g., [avt-inc.com](http://avt-inc.com)), and a detailed explanation of your request. If you would like to delete, amend, or correct your Personal Data and are contacting us by email, please put "Deletion Request" or "Amendment/Correction Request" in the subject line of the email. We will respond to all reasonable requests in a timely manner and may need to further confirm your identity in order to process certain requests.

Once we receive your request, we may need to contact you to further verify relevant details. You may be entitled, in accordance with applicable law, to submit a request through an authorized agent. To designate an authorized agent to exercise your rights and choices on your behalf, please provide sufficient proof of assignment of authority.

## **Additional Notice to California Residents**

Subject to certain limits under California Civil Code § 1798.83, California residents may ask us to provide them with (i) a list of certain categories of Personal Data that we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, and (ii) the identity of those third parties. To make this request, California residents may contact us at [privacy@avt-inc.com](mailto:privacy@avt-inc.com).

In addition to the Privacy Choices listed above, in accordance with applicable law, California residents may also opt-out of the sale of their information by clicking the "Do Not Sell My Personal Information" link or by calling toll free (844) 842-6676. We will not discriminate against you for exercising your rights, and any difference in services as a result of your decision not to provide us with Personal Data is reasonably related to the value of such data.

## **Data Security**

AVT Ltd maintains reasonable technical, administrative and physical controls to secure any Personal Data collected through the AVT Ltd Sites. However, there is always some risk that an unauthorized third party could intercept an Internet transmission, or that someone will find a way to thwart our security systems. We urge you to exercise caution when transmitting Personal Data over the Internet, especially your financial-related information. AVT Ltd cannot guarantee that unauthorized third parties will not gain access to your Personal Data; therefore, when submitting Personal Data to AVT Ltd Sites, you must weigh both the benefits and the risks.

## **Third Party Sites and Social Media Plug-ins**

This Privacy Policy does not apply to AVT Ltd Sites that do not link to this Privacy Policy, or to third-party Web sites to which AVT Ltd Sites may link. AVT Ltd Sites may use social media plug-ins (e.g., the Facebook “Like” button, “Share to Twitter” button) to enable you to easily share information with others. When you visit AVT Ltd Sites, the operator of the social plug-in can place a cookie on your computer or other electronic device that enables that operator to recognize individuals who have previously visited our Site or other sites or services and to receive information that you have visited our AVT Ltd Site. The social media plug-in also allows the social media Web site to share information about your activities on our AVT Ltd Site with other users of their social media Web site. These sharing settings are managed by the social media Web site and governed by its privacy policy.

## **Accessing Our Sites Globally**

This site is owned and operated by AVT Ltd in Israel, but the information you provide will be accessible to our affiliates, vendors, and suppliers in other countries in accordance with this policy. Furthermore, if you are visiting this site from a country other than Israel, your communication with us will necessarily result in the transfer of information across international borders. The level of legal protection for Personal Data is not the same in all countries; however, we will take the security measures described in this Privacy Policy in an effort to keep your information secure. By using this site, you understand that your Personal Data will be stored and processed in Israel and in any country to which we may transfer your information in the course of our business operations.

AVT Ltd may transmit Personal Data about you to related affiliates worldwide. These affiliates may in turn transmit Personal Data about you to other related affiliates. Some affiliates may be in countries that do not ensure an adequate level of data protection. Nevertheless, all of AVT Ltd’s related affiliates are required to treat Personal Data in a manner consistent with this policy. We only transfer your Personal Data internationally or to a third party when we are satisfied that adequate levels of protection are in place to protect the integrity and security of your Personal Data being processed, in compliance with applicable data protection laws. Where necessary, including for transfers to affiliates, we use Standard Contractual Clauses approved by the European Union to provide such protection. To obtain additional information regarding the safeguards we have in place for cross-border transfers of Personal Data, please contact us using the information provided in the “Your Privacy Choices” section.

## **Changes to Our Privacy Policy**

We will only use Personal Data in the manner described in this Privacy Policy in effect when the information was collected from you or as authorized by you. However, and subject to any applicable consent

requirements, we reserve the right to change the terms of this Privacy Policy at any time. Any changes to this Privacy Policy will be reflected on this page with a new effective date. AVT Ltd encourages you to review this Privacy Policy regularly for any changes. Any Personal Data collected upon your continued use of AVT Ltd Sites will be handled in accordance with the currently-posted Privacy Policy.

## **Russian Residents Only**

This section of the Privacy Policy applies to Russian residents only.

Processing of your Personal Data will be performed by AVT Ltd, having its registered address at [6 Hanagar Street, Hod HaSharon 4527703, Israel, [info@avt-inc.com](mailto:info@avt-inc.com)], for the purposes and on the legal basis defined in this Privacy Policy. We will always obtain your prior express consent when processing your Personal Data for marketing purposes or using tracking technologies, such as cookies.

The data controller under this Privacy Policy for Russian users is 6 Hanagar Street, Hod HaSharon 4527703, Israel, [info@avt-inc.com](mailto:info@avt-inc.com).

We will carry out the following operations on your Personal Data with and without use of automated means: collection, recording, systematization, accumulation, storage, specification (update, modification), retrieval, use, transfer (provision, access), including cross-border transfers, depersonalization, deletion and destruction.

We share information about your use of AVT Ltd Site with third parties and transfer your information outside of Russia for certain business purposes. If you would like to get more information on these third parties and the countries to which we transfer your Personal Data, please contact us as described in the “Your Privacy Choices” section and we will provide you with the information on names, locations of those third parties as well as their roles in processing your Personal Data.

When processing your Personal Data, we ensure that recording, systematization, accumulation, storage, adaptation/alteration, and retrieval of your Personal Data is primarily performed in a Russian database, once this information is collected. Then we may transfer your Personal Data to third parties as described in this Privacy Policy.

AVT Ltd implements necessary legal, organizational and technical measures to secure any Personal Data collected through the AVT Ltd Sites, including:

- [Restriction of access to the Personal Data on a need-to-know basis, i.e. only to individuals who require such data to perform their respective duties;
- Ensuring physical security of premises where our information systems are located;
- Use of hardware and software information security tools, such as state-of-the-art malware protection and firewalls; and