



ThetaRay Privacy Policy



Revision History and approvals

Date	Version	Name	Description
15/04/2024	1.0	Lior Marom	Approve draft



1. General

ThetaRay Ltd. and its affiliated companies (together: "Us", "We", "ThetaRay") are dedicated to providing you with the highest level of transparency and control over the use of your data. In order for us to provide you with our services ("Services") we are required to collect and process certain personal information about you and your activity.

This Privacy Policy ("Privacy Policy" or "Policy") was designed to help you understand the information we collect, store, use and share, and it applies whenever you visit our website at: <https://www.thetaray.com/> ("Website"), or otherwise access or use our Services.

This Privacy Policy is integrated into and forms part of the ThetaRay Terms of Service, which are currently available at <https://www.thetaray.com/terms-and-conditions/>.

Contents

1. What Types of Data We Collect?	3
2. Why We Process Your Personal data?	4
3. With Whom Do We Share Your Personal Data?	5
4. Tracking Technologies	6
5. How We Protect Your Personal Data?	6
6. Retention	6
7. User Rights	7
8. International Transfers of Personal Data	7
9. Our Policy Toward Children	7
10. Links to Other Websites or Services	8
11. Updates to This Policy	8
12. How to Contact Us?	8

1. What Types of Data We Collect?

When you visit or interact with us through our Website, we may collect personal data from you, meaning any information which potentially allows your identification with reasonable means ("Personal Data"). We may collect the following Personal Data:

- **Contact Information:** when you request for a demo on our Website, or subscribe to our communications (such as newsletter, service updates or through customer support), we will ask you to provide us with certain contact details such as your name, email address and phone number. In addition, if you contact us, for example by using the "contact us" form on our Website or by sending us an email, we may also receive your name, email address, and any other Personal Data you may choose to provide us with.
- **Usage information:** when you interact with our Website, we collect your online identifiers, such as Internet Protocol (IP) address, general location, Cookie ID and device identifiers (e.g., MAC address and UUID).

- Additional information received from third parties:** we may receive your data from third parties who help us with the provision and maintenance of our Service, such as traffic analytics vendors, fraud prevention agencies and others. Such information may include user identifiers, device information, and summaries of actions taken by you on those partners' websites (e.g. clicks, purchases, views, etc.).

We may also collect information that is un-identified and non-identifiable information pertaining to a user(s), which may be made available or gathered via your access to the Services ("**Non-personal Data**"). We are not aware of the identity of a user from which the Non-personal Information was collected. Non-personal Data which is being collected may include your aggregated usage information and technical information transmitted by your device, including certain software and hardware information (e.g. browser type, language preference, access time, etc.) in order to enhance the functionality of our Services. We may also collect information on your activity on the Services (e.g. clicks, actions, etc.).

If we associate Non-personal Data with Personal Data, we will treat it as Personal Data.

2. Why We Process Your Personal data?

The table below explains for what purposes we use your Personal Data and outlines the legal bases that underlie our usage:

Purpose	Legal Basis
Provision of Website; support – we will use your Personal Data in order to provide you with our Services and to respond to your inquiries.	The legal bases for processing this data are the performance of our contractual towards you; your consent (for example, when you provide Personal Data); and our legitimate interests. Our legitimate interests in this case are the provision of our Website and supporting our customers.
Improve our Website - we collect and analyze information about you and your usage of our Website for the purposes of usability, quality, functionality and effectiveness of our Website, including debugging to identify and repair errors and undertaking internal research for technological development and demonstration.	The legal basis for processing this data is our legitimate interest. Our legitimate interests in this case are providing and improving our Website and Services.
Marketing purposes – We may use your Personal Data in the following ways: we may send you promotional material concerning our Services, or our partners' services, which we believe might interest you; we may also display certain adverts on our Website or our	The legal bases for processing this data are your consent (when required) and our legitimate interests. Our legitimate interests in this case are providing you with tailored services, content and advertisements that better correspond with your interests.



<p>partners' websites, which we believe will be relevant for you. We make our best efforts to make sure you see only relevant ads and receive relevant communications from us, including but not limited to, by building an automated profile based on your Personal Data.</p>	
<p>Protecting our interests – we may use your Personal Data when we believe it is necessary in order to take precautions against liabilities, investigate and defend ourselves against any third party claims or allegations, investigate and protect ourselves from fraud, protect the security or integrity of our Website or Service, protect the rights and property of ThetaRay, its users or partners, and enforce our policies.</p>	<p>The legal bases for processing this data are compliance with our legal obligations and our legitimate interests. Our legitimate interests in this case are keeping the integrity of our Services; detection of fraudulent activities; and the safety of our users.</p>
<p>Compliance with legal and regulatory requirements – we may use your Personal Data to investigate violations, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process.</p>	<p>The legal bases for processing this data are compliance with our legal obligations and our legitimate interests. Our legitimate interests in this case are compliance with our legal obligations and assisting law enforcement agencies.</p>

3. With Whom Do We Share Your Personal Data?

- **Internal concerned parties** – we share your Personal Data with companies in our group, as well as our employees, in order to provide you with our Services and Website.
- **Business partners** – we may share your Personal Data with business partners, such as storage, CRM and analytics providers, who help us provide you with our Services and Website. These third parties may have access to your Personal Data so that they may perform these tasks on our behalf, but they are obligated to comply with this Privacy Policy and may not use your Personal Data for any other purpose.
- **Compliance with laws and law enforcement entities** – we cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any data about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal processes (including but not limited to subpoenas), to protect our or a third party's property and rights, to protect the safety of the public or any person, or to prevent or stop any activity we may consider to be, or to pose a risk of being illegal, unethical, inappropriate or

legally actionable. We also may be required to disclose an individual's Personal Data in response to a lawful request by public authorities, including meeting national security or law enforcement requirements.

- **Merger and acquisitions** – we may share your data if we enter into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets. Any party that acquires our assets as part of such a transaction may continue to use your data in accordance with the terms of this Privacy Policy.

4. Tracking Technologies

When you visit or access our Website we use (and authorize third parties to use) web beacons, pixels, cookies, local storage, and other tracking technologies. These allow us to automatically collect information about you, your device and your online behavior, in order to enhance your navigation in our Website, improve our Website's performance, perform analytics and customize your experience. In addition, we may merge information we have with information collected through these tracking technologies with information we may obtain from other sources and, as a result, such information may become Personal Data. Detailed information about the tracking technologies employed by us, along with instructions on how to opt out of their use, can be found when you visit our Website (in the pop-up box referring to acceptance/rejection of cookies).

5. How We Protect Your Personal Data?

We have implemented administrative, technical, and physical safeguards to help prevent unauthorized access, use, or disclosure of your Personal Data. Your data is stored on secure servers and isn't publicly available. We limit access of your information only to those employees or partners on a "need to know" basis, in order to enable the carrying out of the agreement between us.

While we seek to protect your information to ensure that it is kept confidential, we cannot absolutely guarantee its security. You should be aware that there is always some risk involved in transmitting information over the internet. While we strive to protect your Personal Data, we cannot ensure or warrant the security and privacy of your Personal Data or other content you transmit using the Website, and you do so at your own risk.

6. Retention

We will retain your Personal Data for as long as necessary to provide our Services, to operate our Website, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under applicable regulations, we will keep records containing Personal Data, account information, communications and anything else as required by applicable laws and regulations.

7. User Rights

The following section describes the rights you may be entitled to. Please note that some rights are only available for residents of specific jurisdictions:

- **Right of access to your Personal Data** - you have the right to receive confirmation as to whether or not Personal Data concerning you is being processed, and access your stored Personal Data, together with supplementary information;
- **Right of deletion** - you have the right to request that we erase or delete Personal Data held about you at any time;
- **Right of rectification** - you have the right to request rectification of your Personal Data in our control in the event that you believe the Personal Data held by us is inaccurate, incomplete or outdated;
- **Right not to be subject to automated decision making** - you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or similarly significant effects to you;
- **Right to data portability** - you have the right to request us to move, copy and transfer your Personal Data easily from one IT environment to another, in a safe and secure way, without affecting its usability;
- **Right to restrict or object to processing** - you have the right to request that we restrict or cease to conduct certain processing of Personal Data at any time;
- **Right to withdraw your consent:** to the extent we process Personal Data on the basis of your consent, you have the right to withdraw your given consent at any time;
- **Right to opt out of processing for direct marketing and statistical survey purposes.**

Please note that these rights are not absolute and may be subject to our own legitimate interests and regulatory requirements. You are welcome to contact us for any questions or requests through our contact details below. We will make an effort to reply within a reasonable timeframe. Please feel free to reach out to us at any time via the following email address: info@thetaray.com. If you are unsatisfied with our response, you can lodge a complaint with the applicable data protection supervisory authority.

8. International Transfers of Personal Data

Personal Data we collect may be stored and processed by our group affiliates, subsidiaries, service providers, consultants or similar, in various jurisdictions around the world, including outside the country in which it was originally collected. The data protection and other laws of these countries may be different than those in your jurisdiction of residence. We will always ensure that applicable safeguards and legal mechanisms are used to ensure that the transfer is aligned with the applicable data protection laws.

9. Our Policy Toward Children

We understand the importance of protecting children's privacy, especially in an online environment. The Website is not designed for or directed at children under the age of 16 years old ("**Minors**"). We do not knowingly collect Personal Data from Minors. If a parent or guardian becomes aware that his or her Minor child has provided us with Personal Data, he or she should contact us using the details provided above.

10. Links to Other Websites or Services

As part of the Website, we may provide links or access to third-party websites. However, we are not responsible for the privacy practices employed by those websites, or the information or content therein. This Privacy Policy applies solely to information collected by us. Therefore, this Privacy Policy does not apply to your use of a third-party website or service accessed from our Website.

11. Updates to This Policy

This Privacy Policy is subject to changes from time to time, in our sole discretion. The most current version will always be posted on our website (as reflected in the “Last Updated” heading). You are advised to check for updates regularly. By continuing to access or use our Website after any revisions become effective, you agree to be bound by the updated Privacy Policy.

12. How to Contact Us?

If you wish to exercise any of the aforementioned rights, or receive more information, please contact us using the details provided below:

ThetaRay Ltd.

Email: info@thetaray.com

International Headquarters

8 Hanagar Street, Hod HaSharon 4501309, Israel

USA Headquarters

Margalit Start-up City, 122 Grand Street, New York, NY 10013

Madrid Office

Calle del Pinar 5, 28006, Madrid, Spain

UK Offices

8 Devonshire Square EC2M 4YJ, London, UK