

## Consolto Privacy Statement

### **1. General**

Consolto Sites Ltd (hereinafter: “**Consolto**”, “**we**”, “**us**”, depending on context) is committed to the protection and security of your Personal Information.

This Privacy Statement (which constitutes a global privacy notice) explains the types of Personal Information (as defined below) that we collect, the purposes for which we collect any such Information, the measures which we take to protect and secure this information, and the other parties with whom we may share it. This Privacy Statement also specifies your rights with respect to your Personal Information, and the manner in which you can contact us about our privacy policies practices.

Please be advised that our privacy practices may vary as a function of the different States in which we operate. If you are an individual in the EU then the ‘Annex to the Privacy Policy for EU Data Subjects’ will apply to our processing of your Personal Information and you will have the additional data subject rights described in that Annex. Please note that if you are an individual in the EU then in the event of any conflict or inconsistency between this Privacy Statement and the ‘Annex to the Privacy Policy for EU Data Subjects’ the Annex prevails.

“Personal Information” is any information concerning an identified or an identifiable individual, including – full name, email address, address, post code, phone number, personal account number, transaction information, details concerning payment card (and any information concerning its use), IP address, and data concerning location while using Consolto’s services or products (hereinafter: “**Personal Information**”).

The term “customer”, means the person or company that signs up for, and has an account with Consolto, whether as an “Agent” (a business customer of Consolto or as an end-customer of the Agent. For the sake of clarity, the terms “you”, “user”, or “participant”, “customer” refer to anyone who uses Consolto.

### **2. Information we collect about you, the ways in which we collect Information, and how may we use your Personal Information**

This section describes the Personal Information that we collect, the ways in which we collect it, and how we may use this Information.

Please note that Consolto does not monitor or use customer content for any reason other than as part of providing our products and services. We do not sell your content or any content that you send, share, or receive while using our products or services to any third party, nor do we use any such content for advertising purposes.

**Personal Information that we collect directly from you, or which we may receive from another Consolto user with respect to your use of Consolto (eg: in a meeting invite)**

| Category   | Examples  | We use this Information to  |
|--|---|---|
| <b>Information that identifies you</b>   | For customers (Agents and end-customer): Account owner name, billing name and address, payment method, PayPal email and phone number, when a recognizable telephone line is used to contact us. | <ul style="list-style-type: none"> <li>● Create a customer account</li> <li>● Provide our products and services</li> <li>● Communicate with customers (Agents and end-clients)</li> <li>● Respond to support requests (eg: technical and pricing or demos)</li> </ul> |
| <b>Other information concerning the Consolto account</b>   | Your phone number, language preference, password  | <ul style="list-style-type: none"> <li>● Create a customer account</li> <li>● Provide our products and services</li> </ul>  |
| <b>Customer content (information that the Agent and/or end-customer provides, sends, uploads, or creates while using Consolto)</b> | Cloud recordings, chat text, messages (including voice recordings), files, and other information shared while using the service   | <ul style="list-style-type: none"> <li>● Provide our products and services</li> <li>● Store recordings</li> <li>● Store chat logs</li> </ul>  |

**2.1. Personal Information that we collect through our system**

| Category | Examples | We use this Information to |
|----------|----------|----------------------------|
|----------|----------|----------------------------|

|  |   |   |
|--|---|---|
| <p>Technical data about your devices, network, and internet connection</p> | <p>device type, operating system type and version, other unique device identifier (UDID).</p> | <ul style="list-style-type: none"> <li>● Monitor the performance of our website, service, data centers, and networks</li> <li>● Connect you to and optimize your experience using our services</li> <li>● Respond to support requests</li> <li>● Conduct anonymized, aggregated analytics to improve our service performance</li> </ul> |
| <p>Setting and preferences chosen by the user</p>                          | <p>Examples: Sound beeps, camera-off, double password.</p>                                    | <ul style="list-style-type: none"> <li>● To provide you choices for how you use our products and services</li> </ul>  |

|          |  |  |
|----------|--|--|
| Metadata | Email address, name, or other information that a user enters to identify herself in the chat<br><br>Duration of chats<br><br>Date/ time that the meeting/chat was scheduled<br><br>Join and leave time<br><br>Appointment scheduling information | <ul style="list-style-type: none"> <li>● Provide you with our services</li> <li>● Respond to support requests</li> </ul> |
|----------|--|--|

## **2.2. Recordings of chats and meetings**

Please note that when you join a meeting or chat to an Agent, the Agent may choose to record the session. In such an instance, the Agent is responsible for obtaining your consent for the recording. Consolto assists Agents to obtain consent by providing visual and audio cues to alert you of a recording.

Please note that we do not monitor, access, or use the recordings or transcripts that an Agent or an end-customer may choose to store in our cloud, unless where explicit consent was provided.

## **2.3. Consolto's website**

We may gather information from you when you visit our website [www.consolto.com](http://www.consolto.com). This site introduces you to Consolto and tells you about us, our products and services and their features, our vision and manifest, and pricing plans.

The Personal Information that we collect from our website comprises information that you choose to give us and information we may obtain from cookies and other similar analytics tools (eg: web beacons).

In the table below, we describe the categories of information that we collect from you if and when you visit our website.

**2.4. Personal Information we collect directly from you through our website if you choose to provide it**

| Category   | Examples  | We use this Information to   |
|--|---|--|
| <b>Information that identifies you</b>                                       | Your name, username, address (actual and email) phone number  | <ul style="list-style-type: none"> <li>● Create an account when you sign up</li> <li>● Respond to requests from you (eg: demos and pricing)</li> <li>● Send you marketing communications (when you opt-in to receive such communications and unless you instruct us not to send these communications)</li> </ul> |
| <b>Information about your business and/or place of work (where relevant)</b> | Company, title, department, industry, place of business   | <ul style="list-style-type: none"> <li>● Provide tailored information</li> <li>● Respond to requests from you (eg: demos and pricing inquiries)</li> </ul>   |
| <b>Payment information</b>   | Credit/debit card information. Please note that this Information is provided directly to our payment processor. We do not store and/or access credit/debit card information | <ul style="list-style-type: none"> <li>● Charge you when you sign up for a paid subscription</li> </ul>  |

## 2.5. Personal Information we may collect about you through our website

| Category   | Examples   | We use this Information to   |
|--|--|--|
| <p><b>Information collected through the use of cookies and other technical tools</b></p> <p>(Please note that all cookies are visible in the Cookie Preferences tool).</p> | <p>Data collected from analytics tools such as Google Analytics and Google Ads. For more information, see our Cookie Policy <a href="https://www.consolto.com/legal/cookie-policy">https://www.consolto.com/legal/cookie-policy</a></p>  | <ul style="list-style-type: none"> <li>● Analyze the use of our website in order to improve your experience</li> <li>● Allow you to complete actions on our website (eg: remember settings or to complete an activity via our site).</li> <li>● Evaluate and measure the performance of our marketing campaigns and activities and improve our marketing campaigns</li> <li>● Send you tailored advertising concerning Consolto when you visit other sites.</li> </ul> |
| <p><b>Third Parties</b></p>  | <p>Examples: Mailing Lists, Public Sources</p> <p>We may use trusted third-party services that track information concerning online activity on our behalf. Visitor information may be provided to other parties for marketing, advertising, or other uses. third-party links occasionally, at our discretion, we may include or offer third-party products or services on our website.</p> | <ul style="list-style-type: none"> <li>● Send you marketing communications when you opt-in and unless you tell us not to send such communications</li> <li>● Provide you with tailored information based on your interests</li> </ul>  |

## 2.6. Cookies

Unless you instruct us differently by way of adjusting your cookie setting, Consolto collects information about you when you visit our website or engage our online ads or email communications. We use data collection technologies such as cookies, pixel tags, browser analysis tools, server logs, and web beacons. Information collected using these tools includes IP addresses, browser type, Internet service provider (ISP), referrer URL, exit pages, the files viewed on our marketing sites (eg, HTML pages and graphics), operating system, date/time stamp, and/or clickstream data.

Cookies are small text files that websites send to your computer or other internet-connected devices. These files are not computer programs and it does not have the ability to read the information which it stores or to perform any activities with this information. The purpose of Cookies is to allow Consolto to recognize you quickly and efficiently when you return to use its services and when you visit other websites, and in this way to provide you a better, more customized service experience and so as to enable us to detect fraud in certain instances.

In addition to Cookies, Consolto also uses “web beacons”, also commonly known as “pixel tags”, “internet tags”, or “clear GIF”, for the regular administration of Consolto’s website and app. Web beacons are tiny graphic files and small blocks of code placed on website pages, ads, and our email communications. The information stored using web beacons does not identify you, it informs and updates us of your preferences with respect to our content and services (for instance, whether an email communication was opened) and thereby allows us to measure the response to our services and communications and thus improve our content and its promotion.

Should you wish to block Cookies during your online browsing you may do so by changing the settings of the browser that you use so as to require your particular consent for each website, or to refuse and block Cookies altogether. Please note that blocking Cookies altogether might hurt the provision of services and other data concerning your browsing preferences, and in this way influence the operation (including availability) of Consolto's websites. For more information and on your choices with respect to cookies and how to turn off optional and advertisement cookies, please review our Cookie Policy:

<https://www.consolto.com/legal/cookie-policy>

## **2.7. Marketing Communications**

You can sign up to receive emails from us. If you have signed up previously but you would like to stop receiving these communications from us, you can update your preferences by using the "unsubscribe" link found in any of these emails, or by emailing [support@consolto.com](mailto:support@consolto.com)

We may also send you push notifications to update you about any events or promotions that we may be running. If you are not interested in receiving such communications, you may turn off the "push notifications" setting on your device.

## **2.8. Additional purposes and uses of personal information**

In addition to the purposes and uses that underscore and require the collection of Personal Information described above, Consolto may also receive Personal Information from you for specific purposes:

- To keep inform and update you on the latest products and services announcements, software updates, upgrades, system enhancements, special offers, pricings, commercial collaborations, and other information
- To provide you with information and offers from us or from relevant third parties

- To improve, tailor, and personalize marketing communications and website content based on your preferences (eg in response to your request for specific information on products or services that may be of interest).
- To provide better services to our customers (Agents and end-customers) through responses to questionnaires and surveys (only if you choose to participate in them).

We may collect Personal Information to manage regular business needs, including account management, website administration, customer reporting, business continuity, data analysis, and additional product or services development.

We also use Personal Information to comply with our contractual and legal obligations, resolve disputes with customers, and enforce our agreements, when needed.

## **2.9. Who may we share your Personal Information with?**

Consolto shall not sell, lease, or transfer any part of your Personal Information with any third party absent your explicit prior consent. Consolto will be allowed to share your Personal Information with third parties:

- The disclosure of your Personal information, in whole or in part, to certain entities is necessary for the provision of services, to maintain personalized, ongoing communication channels between us and you, and for data security (including your data), and to prevent unlawful and/or unauthorized use of your account or details, such as your payment card. It should be stressed that, unless provided otherwise, these entities do not have a right to use any such information beyond the purpose for it has been provided by Consolto.
- Consolto shall provide Personal Information to third parties insofar as it is required to do so by law or in legal proceedings.
- In cases when Consolto finds that your conduct or use of its products or services is in breach of our terms and conditions in any way constitutes a fraud of any kind.

- The transfer of Personal Information is required by law or required by affiliated parties that process or clear the transactions of the payment card used to pay for our products or services.
- The information is provided as required by law to other entities in the case of the sale or transfer of our business or assets.

#### **2.10. How long do we retain your Personal Information?**

Consolto shall retain your Personal Information for as long as the retention of this information is required for the above listed purposes and for any additional period that is or may be required and permitted by law. The duration of time for which your Personal Information is retained may vary subject to the purposes for which it is gathered, the manner in which it is used, and regulatory compliance.

#### **2.11. Transfer of Personal Information**

We may transfer your Personal Information to other countries where the data protection laws are different than those applicable in the country in which you have initially provided your Personal Information. In these cases, Consolto shall secure and protect your Personal Information in accordance with this Privacy Statement, or as otherwise disclosed to you.

#### **2.12. How do we secure your Personal Information**

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of individuals Consolto maintains, and shall maintain, appropriate technical and organizational measures to ensure a level of security appropriate to the risk of Processing Personal Information. To that end, Consolto adopts various measures to protect and secure information and your privacy and it updates these measures from time to time, in accordance with the law.

### **3. Your rights**

Subject to the relevant jurisdiction and the applicable law, you may have the right or choice:

- To refuse or object to the collection or use of some types of your Personal Information, including to the use of Cookies and similar technologies, or to the use of your Personal Information for marketing purposes.
- To access your Personal Information, correct it, restrict or object altogether to its processing, or ask for it to be deleted.
- To receive a copy of the Personal Information that we store about you in order to transfer it to another company.
- To revoke any consent which you have previously provided.
- Where applicable, to file a complaint with the supervising authority.

#### **4. How to contact us**

We can be contacted by email: [support@consolto.com](mailto:support@consolto.com)

#### **5. Updates to this privacy notice**

Subject to the required laws and regulations, this Privacy Statement may be updated periodically. In any case of a substantial change to this Privacy Statement or a change in the manner in which Consolto uses the information and details provided by you, Consolto shall inform you of any such change by placing an announcement on its website or through an email communication.

## **Annex to the Privacy Statement for EU Data Subjects**

### **1. What is the purpose of this Annex?**

This Annex applies to the processing by Consolto of the personal information of any individuals in the European Union. It is supplemental to the Consolto global Privacy Statement and does not override it; however, in the event of any conflict or inconsistency between this annex and the Privacy Statement this annex shall prevail.

Consolto does not have any establishment in the European Union. Accordingly, this Annex is only intended to apply to Consolto customers and to any other individuals who may use any Consolto products and services if and to the extent that Consolto's processing activities are related to the offering of products or services to such persons in the European Union.

All capitalized terms used in this Annex and not separately defined in this Annex are as defined in the Privacy Statement.

### **2. Who are we?**

Consolto Sites Ltd (hereinafter: "**Consolto**", "**we**", "**us**", depending on context), a company incorporated in Israel under registered number 51-578900-6 whose registered office is at Emek ha-Shalom 56 Yokne'am Illit is the data controller and responsible for the website at [www.consolto.com](http://www.consolto.com) on which the Consolto global Privacy Statement and this Annex are published. The data controller is responsible for deciding how it holds and uses Personal Information about you.

### **3. What Personal Information do we collect, how, and for what purposes?**

Consolto's Privacy Statement explains the Personal Information that Consolto collects, how that Personal Information is collected, and the purposes for which Consolto collects and processes your Personal Information.

Consolto collects and processes Personal Information only if and when it has a legal basis to do so.

- We may process your Personal Information for purposes necessary for the performance of our contract with you, or for steps preparatory to entering into a contract with you, and to comply with our legal obligations.

- We may process your Personal Information for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of your Personal Information. This includes processing for marketing, business development, statistical and management purposes.
- We may process your Personal Information for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your Personal Information then (i) we will request such consent from you separately, and (ii) you have the right to withdraw your consent to processing for such specific purposes.
- Please note that we may process your Personal Information on more than one lawful ground depending on the specific purpose for which we are using your data.
- Where we need to use your Personal Information for another reason, other than for the purpose for which we collected it, we will only use your personal information where that reason is compatible with the original purpose. Should it be necessary to use your Personal Information for a new purpose, we will notify you and communicate the legal basis which allows us to do so before starting any new processing.
- If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations.

#### **4. Data Retention**

We will only retain your Personal Information for as long as is necessary to fulfil the purposes for which it is collected. When assessing what retention period is appropriate for your Personal Information, we take into consideration:

- The requirements of our business and the services provided;
- The purposes for which we originally collected the Personal Information;
- The lawful grounds on which we based our processing;

- The types of Personal Information we have collected;
- The amount and categories of your Personal Information; and
- Whether the purpose of the processing could reasonably be fulfilled by other means.

## **5. Data Sharing**

We will share your Personal Information with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so.

“**Third parties**” includes third-party service providers. The following activities are carried out by third-party service providers: IT and data storage services, professional advisory services, clearance and payment services, administration services, marketing services and banking services.

All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal information. We only permit our third-party service providers to process your Personal Information for specified purposes and in accordance with our instructions.

We may share your Personal Information with other third-parties, for example in the context of the possible sale or restructuring of our business, where an external organization conducts an audit or undertakes quality checks for us, or where sharing with third parties is appropriate in order to provide our services to you. We may also need to share your Personal Information with a regulator or to otherwise comply with the law. We may disclose your Personal Information in order to protect our rights or property or those of our customers or others.

## **6. Transferring Personal Information outside the EEA**

We are based outside the EEA and accordingly we will process your Personal Information outside of the EEA. If any third parties by whom your Personal Information is to be processed are also based outside the EEA so that their processing of your Personal Information will involve a transfer of data outside the EEA we will

ensure a similar degree of protection is afforded to it by ensuring that at least one of the following safeguards is implemented:

- We will only transfer your Personal Information to countries that have been deemed to provide an adequate level of protection for Personal Information by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give Personal Information the same protection it has in Europe.
- Where the third parties are based in the US, we may either use the above contracts approved by the European Commission or we may transfer data to them if they are part of the EU–U.S. Privacy Shield which requires them to provide similar protection to Personal Information shared between the Europe and the US. <https://www.privacyshield.gov/EU-US-Framework>

## **7. Data Security**

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of individuals Consolto maintains, and shall maintain, appropriate technical and organizational measures to ensure a level of security appropriate to the risk of Processing Personal Information.

We have put in place commercially reasonable and appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **8. Your rights**

Under certain circumstances, by law you have the right to:

- Request access to your Personal Information. This enables you to receive details of the Personal Information we hold about you and to check that we are processing it lawfully.
- Request correction of the Personal Information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if your Personal Information changes of which we need to be made aware.
- Request erasure of your Personal Information, also known as the ‘right to be forgotten’. This enables you to ask us to delete or remove Personal Information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Information where you have exercised your right to object to processing (see below).
- Object to processing of your Personal Information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your Personal Information for direct marketing purposes.
- Request the restriction of processing of your Personal Information. This enables you to ask us to suspend the processing of Personal Information about you, for example if you want us to establish its accuracy or the reason for processing it.
- In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your Personal Information for a specific purpose (eg, in relation to any direct marketing which you have indicated you would like to receive from us), you have the right to withdraw your consent to the use of your information for that purpose at any time.
- Request the transfer of your Personal Information to another party.

If you want to exercise any of the above rights, please email [support@consolto.com](mailto:support@consolto.com)

You will not have to pay a fee to access your Personal Information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances. Please note that we may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it. You can exercise this option at any time by contacting us by email at [support@consolto.com](mailto:support@consolto.com). Once we have received notice that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so.

#### **9. Changes to this Annex**

Any changes we may make to our Privacy Statement including to this annex in the future will be posted on this webpage. This policy was last updated on July 10th, 2020.

#### **10. Questions regarding this policy**

Should you have any questions regarding this Privacy Policy, you can contact us by email at [privacy@consolto.com](mailto:privacy@consolto.com)