# **Privacy Policy**

We, at A.D. Integrity Applications Ltd. and its affiliates ("Integrity" or "we" or "us" or "our"), put great efforts in making sure that we secure your personal data and use it properly.

This policy explains our privacy practices for processing your personal data as a user of our services on our website (http://www.glucotrack.com/) ("Website") and/or through other registration or contact channels ("Service"). We process your personal data subject to the terms of this policy.

## Visiting our Website

- IP address of the computer sending the request,
- Date and time of Website access,
- Name and URL of the retrieved file,
- Website from which our site was accessed (referral URL),
- Browser used and, if applicable, your computer's operating system as well as the name of your access provider.

The above-listed data will be processed by us for the following purposes:

- Ensuring a smooth connection setup to the Website,
- Ensuring easy use of our Website,
- Evaluation of system security and stability
- Clarification of any improper page access (DoS/DDoS attacks, etc.), and
- Further administrative purposes.

If you are in the European Union, then the legal basis for such processing of personal data is Art. 6 (1), lit. f, GDPR. Our legitimate interest is derived from the above-listed purposes for data collection.

## **Controller; Representative**

A.D. Integrity Applications Ltd. is the data controller in relation to the processing of the personal information that you provide to us when you use our Website and a data processor in relation to the processing of the personal information that you provide to us when you use our Services. Our contact details are 19 Ha'Yahalomim St., Ashdod, 7761117, Israel, tel. +972.8.675.7878, email privacy@integrity-app.com.

## Making contact

If you have questions of any kind, we offer you the option to contact us by regular mail, telephone, fax, email or via the Website (by using or contact form). If you are in the European Union and you make personal data available to us via these means of communication, we will only save and use this data on the basis of Art. 6 (1), lit. a, GDPR, to process and respond to your inquiries or on the basis of Art. 6 (1), lit. b, GDPR if the subject of your inquiry relates to contractual information.

You may withdraw your consent to the processing of the provided data at any time by sending an email to privacy@integrity-app.com. In this case, we will delete your data, unless we have a legal retention obligation (for example, if you send us a pre-contractual message via the contact form which then

becomes the basis of a contractual relationship or if your message refers to existing contractual relationships).

#### **Sharing Personal Data**

We do not sell, rent or lease your personal data. We will share your personal data with service providers and other third parties, which may include our affiliates (i.e. companies within the Integrity group), if and to the extent necessary to fulfill the purposes for collecting such information and deliver the Service to you. Any such third party will commit to protect your privacy as required under applicable law and this policy and shall be bound to our requirements, which include processing of your personal data exclusively in line with our instructions and in compliance with the applicable law and, If you are in the European Union, subject to Art. 28 GDPR.

#### Routine deletion and blocking of personal data

We only process and store personal data for the period that is required to achieve the purpose of the storage, or for the duration the processing and storage are required by laws and regulations we are subject to. If the purpose of storage no longer applies or a retention period required by applicable laws expires, the personal data is routinely blocked or deleted in accordance with legal requirements.

#### Your Rights

If you are in the European Union, you have the following rights:

- To obtain information from us about the personal data we process according to Art. 15 GDPR. In particular, you may request information about the purposes of the processing, the categories of personal data, the categories of recipients to whom your personal data have been or will be disclosed, the envisaged period for which the personal data will be stored, the existence of the right to request rectification, erasure, restriction of processing or to object, the right to lodge a complaint, the source of your data if they were not collected by us, as well as the existence of automated decision-making, including profiling, as well as meaningful information about the associated details;
- To request without delay the rectification of incorrect or incomplete personal data stored by us according to Art. 16 GDPR;
- To request, according to Art. 17 GDPR, the erasure of personal data stored with us, unless the processing is necessary for exercising the right of freedom of expression and information, full compliance with legal obligations, for reasons of public interest, or for the establishment, exercise or defence of legal claims;
- To request restriction of processing your personal data according to Art. 18 GDPR, if you contest the accuracy of the data, if the processing is unlawful but you oppose the erasure of the data, and if we no longer need the personal data but you require them for the establishment, exercise or defence of legal claims, or if you exercised your right to object to processing according to Art. 21 GDPR;

- To request your personal data, which you have provided to us, in a structured, commonly used and machine-readable format or to demand the transmission to another controller according to Art. 20 GDPR; and
- To lodge a complaint with a supervisory authority in accordance with Art. 77 GDPR. You can generally contact the supervisory authority at your usual place of residence or workplace or at our seat for this purpose.

For the removal of doubt, whether you are in the European Union or not, if you find that the information associated with you is not accurate, complete or up-to-date, please provide us the necessary information to correct it.

At any time, you can contact us at: privacy@integrity-app.com and request to access the personal data that we keep about you. We will ask you to provide us certain credentials to make sure that you are who you claim to be and will make good-faith efforts to locate your personal data that you request to access.

Under your right of access, you can obtain confirmation from us of whether we are processing personal data about you, receive a copy of that data, so that you could:

- Verify its accuracy and the lawfulness of its processing;
- Request the correction, amendment or deletion of your personal data if it is inaccurate or if you believe that the processing of your personal data is in violation of the applicable law.

We will use judgement and due care to redact from the data which we will make available to you, personal data related to others.

## **Right to object**

If you are in the European Union and to the extent your personal data is processed on the basis of legitimate interests pursuant to Art. 6 (1), lit. f, GDPR, you have the right to object to the processing of your personal data pursuant to Art. 21, GDPR on grounds relating to your particular situation. To exercise this right to object, it is sufficient to send an email to privacy@integrity-app.com.

## **Cookies and Other Tracking Technologies**

Cookies are small files that a web server sends to a user's device, when the user browses online.

Your device removes session cookies when you close your browser session. Persistent cookies last for longer periods. You can view the expiry date of each cookie, through your browser settings.

We may use both types. We may use persistent cookies or similar technologies (such as tokens) to remember your log-in details (if and when login is made available through the Website) and make it easier for you to log-in the next time you access the Service. We may use this type of cookies and Session Cookies for additional purposes, such as content adjustability, in order to facilitate the use of the Service's features and tools.

Every browser allows you to manage your cookies preferences. You can block or remove certain cookies or all of them through your browser settings. Please bear in mind that blocking or removing cookies will influence your user experience with our Service. For example, disabling or blocking our cookies will require you to re-enter your log-in details, or even prevent you from using features of the Service.

## **Dispute Resolution**

We do periodical assessments of our data processing and privacy practices, to make sure that we comply with this policy, to update the policy when we believe that we need to, and to verify that we display the policy properly and in an accessible manner.

If you have any concerns about the way we process your personal data, you are welcome to contact our privacy team at: privacy@integrity-app.com or write to us at: 19 Ha'Yahalomim St., Ashdod, 7761117, Israel.

We will investigate your query and make good-faith efforts to resolve any existing or potential dispute with you.

## **Changes to this Privacy Policy**

From time to time, we will update this policy and post a revised policy with an updated effective date.

Until the new policy takes effect, if it materially reduces the protection of your privacy right under the then-existing policy you can choose not to accept it by terminating your use of the Service. Continuing to use the Service after the new policy takes effect means that you agree to the new policy. Note that if we need to adapt the policy to legal requirements, the new policy will become effective immediately or as required by law.

## Contact Us

Please contact our Privacy Team at: privacy@integrity-app.com for further information.