Data Protection and Privacy Policy

Last Updated: April, 2023

PREAMBLE

We at **C-crop Ltd.** (hereinafter: "**C-CROP**" or "**Our**" or "**We**" or "**Us**"), are committed to protect your Personal Data. This Data Protection and Privacy Policy explains how C-CROP collects, processes, and stores the information from you or other data subjects through our website (hereinafter: "**Website**") and through our dedicated App (hereinafter: "**App**").

As used in this policy, **"Personal Data"** or "Personal Data" means information that refers to, is related to, or is associated with an identified or identifiable individual or as otherwise may be defined by applicable law, such as a name, address, telephone number, e-mail address, information about activities directly linked to a person, such as that person's location or IP information.

This Data Protection and Privacy Policy (hereinafter: "**Policy**") may be revised or updated from time to time, and such changes shall come into effect from the moment C-CROP publish the new policy notifies you of such changes and/or updates, either by email, notification on our Website or App or any other reasonable manner.

For any questions regarding the collection, processing or use of Personal Data relating to you and exercising your data subject rights (all as explained below) please contact us, at our dedicated data protection and privacy e-mail address: contact@c-crop.co.il.

GENERAL PRINCIPLES OF OUR DATA PROTECTION

C-CROP is committed to ensuring that your Personal Data and the privacy of your data is protected according to the appropriate industry standards and practices in relation to the data we collect, and all in correspondence to C-CROP's relevant legal obligations.

This policy explains your rights regarding the Personal Data C-CROP collects, processes, and uses through the C-CROP Website and App, as well as C-CROP's use of safeguards to protect these rights.

This Policy further applies also to C-CROP's use of cookies and tracking tools, as specified in detail in our Cookies and Tracking Tools Policy (make a hyperlink to the policy) as we use cookies and tracking tools on our Website or App to distinguish you from other and to improve your use of our Website or App, and in some cases, certain features may not function if you remove the cookies from your browser.

We collect and process your Personal Data in good faith, in a proportionate manner according to the declared purpose, and with the appropriate technical and organizational measures in line with the state-of-the-art measures, while taking into account the risks represented by our collection and processing and the nature of the Personal Data and data protected by us.

If any collection and processing of Personal Data will be carried out, in the course of C-CROP's business and provision of services, by external data processors on Our behalf, C-CROP will require, within the framework of its contracts with such external processors, for them to comply with the relevant data protection obligations required by us, according to any requisite data transfer mechanisms required under applicable law which need to be executed, **prior** to the transferring your Personal Data and data.

Important note: please refrain from browsing our Website, our App, sending us e-mail messages with queries or requests, or otherwise providing Us with your Personal Data, if you do not consent to the collection, use, processing or disclosure of this data as set forth herein.

YOUR RIGHTS TO LIMIT OUR COLLECTION AND PROCESSING

You have certain rights in relation to the Personal Data that we hold about you, as detailed below:

• **Consent** – Where you provide us with your Personal Data subject to consent, we will only process your Personal Data if you have consented to such processing, unless We are otherwise legally authorized or obliged to collect and further process Personal Data relating to you any of your rights below.

If we process data solely based on your informed consent, We will only use the data for the purposes stated in the consent procedure and within the scope outlined below.

• Withdrawal of consent – Where we process data based on your informed consent, You may revoke or withdraw your consent at any time by contacting and requesting so from us through our dedicated privacy e-mail address, and We will stop processing your Personal Data unless We are either: (1) legally obliged or (2) authorized to continue processing your information based on alternative lawful grounds, including for ongoing legitimate business interests, which we will notify you in our response to your request, where applicable.

Please be aware that in the event of withdrawal of consent, C-CROP may be unable to continue providing you services, wholly or partially, as you will be informed in response to your request, and by requesting such, you hereby irrevocably agree and waive any claim against C-CROP's inability to provide the services through the Website or App following such amendment or deletion.

• The Right of Deletion ("To be Forgotten") and Right of Rectification - You may also request the erasure or correction of all or part of your Personal Data that is held by C-CROP

Upon your request, C-CROP will accommodate your request and delete (or alternatively equivalently irreversibly anonymize) or correct your Personal Data or remove from part or all of our records, as per your request, as soon as reasonably possible and when technically feasible, and unless there is: (1) an overriding legal interest as per applicable law or (2) we have an alternative

lawful grounds for the continuation of the processing of your Personal Data, which we shall notify you in response to your request.

Please be aware that in the event of deletion or correction of Personal Data upon your request, C-CROP may not be able to further provide you the services you applied for through the Website or App, in whole or in part and by requesting such deletion/correction, to the extent applicable, you hereby irrevocably agree and waive any claim against C-CROP's inability to provide the services through the Website or App following such amendment or deletion.

• **Personal Data of children and minors** - We do not knowingly collect or process Personal Data relating to children and minors under the age of 18, and our services and/or Website not aimed at minors of any age.

If we become aware that Personal Data was transferred to us or collected by us relating to children and minors under the age of 18 years without the informed consent of a parent or legal guardian or according to a legal obligation from a court or governmental authority, We will delete such Personal Data without undue delay.

If the request for erasure of data relates to the Personal Data of a child or minor, please attach to the request adequate proof of your status as parent or guardian of the child or minor.

• Transparency (Right to be Informed), Right of Access and Data Portability.

You are entitled to ask us:

- 1) To provide us with Information on what type of Personal Data about you has been collected by C-CROP and for what purposes it is being used; and
- 2) To ask us to allow You to view or to provide you with a copy of the Personal Data held on You by C-Crop; and
- 3) To end you (in a commonly used and machine-readable form) a copy of your Personal Data, for you to reuse your Personal Data as you have provided to us for your own purposes, free of charge, subject to technical feasibility and lawfulness considerations as you will be notified on upon forwarding such a request to C-CROP.
- Automated decision-making. C-CROP shall not intentionally take any potentially damaging decision concerning you because of using automated processing and decision-making operations without human intervention; and commits that where such will be implemented, we will give you the opportunity to obtain human intervention in such a decision, express your point of view, and obtain an explanation of the decision.

Important Notes:

• In the implementation of these data protection rights, C-CROP is committed to providing a timely and transparent response to your requests and upholding your

right to contact us on data protection and privacy protection manners at the dedicated e-mail address: contact@c-crop.co.il.

- Any data subject right you wish to uphold by Us, may be subject to us verifying your identity and asking you to provide Us with relevant and/or sufficient information required to that end as the data subject of said Personal Data, and we shall inform you accordingly, if applicable, in such an event.
- If you believe C-CROP has violated any of your data subject rights, you are entitled to:
 - For EU countries file a complaint to the Data Protection Authority in your jurisdiction of residence about the alleged data protection breach;
 - file a lawsuit to the courts of the state of your residence.

Information We Collect:

The Personal Data collected and used by C-CROP is limited strictly to any data which is necessary for us to provide you with services you request in the course of our ongoing business while operating under our relevant legal and data protection legislation and regulations obligations, as detailed herein below:

1. Collection of Personal Data Occurs

1.1. **On our Website when You:**

- 1.1.1. Contact us via our designated support e-mail address or electronic form through our "Contact Us" page of our Website
- 1.1.2. When you sign-up or sign-in to our designated, registered User area on our website.
- 1.1.3. When you browse through the website through use cookies and tracking technologies.
- 1.1.4. When you leave a testimonial regarding our Service and/or App.

1.2. **On our App when You:**

- 1.2.1. Input data through the user interface regarding your field/tracks of land;
- 1.2.2. Record video clips of crops, plants and the surrounding area;
- 1.2.3. When we draw data regarding your mobile phone or end-user device for both identity verification and suitability of use according to the minimum specifications for our App;

2. What are the fields of Personal Data that We may collect and when might we collect:

2.1. **On our Website when You:**

- 2.1.1. When you contact us through our contact details on the Website, we may collect the following fields of Personal Data: 2.1.1.1. Your full name
 - 2.1.1.2. your email address;

2.1.1.3. the Content of your inquiry and/or request, and any Personal Data you elect to input therein;

2.1.2. When you Log-In to our Registered Users Area

- 2.1.2.1. Email Address
- 2.1.2.2. Password

2.1.3. <u>Sign-Up for receipt or marketing materials and/or offers from</u> <u>Us or our affiliates and partners</u> 2.1.3.1. Full Name

- 2.1.3.2. E-mail Address
- 2.1.4. When you Leave a Testimonial on our Service we may collect any or all of
 - 2.1.4.1. Your Full Name
 - 2.1.4.2. <u>Your Affiliation (e.g. Land owner, Field Manager</u> etc.)
 - 2.1.4.3. <u>Any personal data contained in the body of your</u> <u>Testimonial;</u>

2.1.5. <u>Sign-Up to our Service:</u>

- 2.1.5.1. Your full name
- 2.1.5.2. Your email address;
- 2.1.5.3. Your designated tract/field
- 2.1.5.4. Your billing address
- 2.1.5.5. A 4-digit token or other token signifying your reoccurring payment method (Credit Card, Paypal etc.)

2.2. **On our App when You:**

- 2.2.1. Sign-Up to our Service:
 - 2.2.1.1. Your full name
 - 2.2.1.2. Your email address;
 - 2.2.1.3. Your designated tract/field
 - 2.2.1.4. Your billing address
 - 2.2.1.5. A 4-digit token or other token signifying your reoccurring payment method (Credit Card, Paypal etc.)
- 2.2.2. <u>When you record video clips and/or take photographs through</u> the App:
 - 2.2.2.1. The name of the tract of land/field which the video is associated with;
 - 2.2.2.2. Any peripheral images captured in the video clip/images;
 - 2.2.2.3. GPS data;
- 2.2.3. <u>When you Log-In to our App for the First Time or Following</u> your Sign-Out when Log-In Again:

- 2.2.3.1. Email Address
- 2.2.3.2. Password

2.3. When you browse through our Website and/or make use our App:

- 2.3.1. Automated Browsing Data which includes information about your computer, your web browser, mobile device, operating system, IP address, your location, language preferences etc.
- 2.3.2. Automated Data on your Mobile Device and/or from your AppleID and/or Google ID which are associated with your device and/or your location.

Why C-CROP Uses your Personal Data:

C-CROP uses data and Personal Data for the following reasons:

- To administer our Website and/or App to verify the integrity and security thereof, as well as assessing the performance of the Website and App for the purpose of ensuring that content in the Websites, Personal Area, Apps and other relevant interfaces is presented in the most effective manner for you; and
- to transfer personal data, where required, to third parties in order to process your subscription/license purchases via the payment methods available to You;
- to employ our AI tools and algorithms on the images and video clips you capture through use of the App for both processing and projecting yields and other information on your crops, plants and/or tracts/fields;
- To train our AI tools using the raw images and/or video clips on plants, crops and/or fields, including the raw statistical and factual data yielded therefrom from your usage, in a anonymous manner which is not affiliated with your username and/or Personal Data.
- to ensure that any users which you invite to register under your main account are assigned to the privileges you are entitled to under your user.
- To send you e-mails, advertisements on deals, discounts and updates regarding Our Services and/or services relevant to you from our analysis through our Service from partners and/or affiliates of C-CROP;
- To assess and analyze the performance and efficacy of the services and features offered by our Website and/or App. Trough use of analytics and statistical tools, based on anonymous data of our users, in order to improve our current and future services.

Responsibility to Acquire Consent from Sub-Users and Not Violating Privacy through Use of the App

In the event that you wish to issue sub-users under your main account, then it is your responsibility to verify vis-à-vis your sub-users (e.g. employees, crop/field workers, supervisors etc.) **before** you provide us with any e-mail address and name you send us so we can generate sub-users under your main account.

Further to the foregoing, it is hereby clarified that you shall hold C-CROP harmless against any claim, complaint or administrative fine levied against C-CROP due to the Your failure to acquire such consent from your sub-users.

If you are using the image capturing or video clip recording functions of the App, you are responsible to verify that you have no captured any Personal Data from third-parties during said use, prior to uploading the image or video clip to our service.

If you have captured any image through use of our App which may violate the rights of third-parties you are responsible to delete such content prior to uploading any images or video clips to our service, and you shall hold C-CROP harmless and indemnify it against any claims relating to such violations resulting from your use of our App.

How you can assist Protecting your Information

If you receive an email that looks suspicious, e.g. refers to an order you do not recall making or requesting information already provided, or you have doubts as to whether an email was actually sent by Us, please contact us and report this.

Please note that we will never ask for payment method details via email and/or any personal information.

Your password protects your user account and you are responsible for maintaining its security and integrity, therefore we encourage you to use a unique and strong password, not to share it with third-parties, as C-CROP will not be liable for any actions taken through your username.

If you have reason to believe your password has been stolen or compromised, please contact Us as soon as possible at:______, so We may suspend your account and assist you in renewing your password.

Similarly, when We promote our and/or our affiliates offers, we do so by using the same email account through which we send you all our marketing communications, and we will not ask for your personal information in these emails (e.g. payment method information, ID numbers or Passport numbers etc.).

How We Protect Information:

We implement generally accepted industry standards to maintain the safety of your Personal Data against loss, alteration, theft or access by unauthorized third parties when you enter, submit, or access your Personal Data and once we receive it. However, no method of transmission over the Internet, or method of electronic storage is flawless or entirely secure.

Therefore, while we strive to protect your Personal Data via the aforementioned technical and organizational means, we cannot guarantee its absolute security. What we can guarantee is that we will not sell, share, transfer or use the data We collect from you for purposes other than those purposes stated expressly herein above.

The above notwithstanding, C-CROP will not be liable or responsible for any damage or loss resulting from the improper use or any breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data.

Third Party Sites:

Our Website may contain links to third party websites, payment pop-up windows or social media platforms. We have no control over third-party sites or services, and all use of third-party sites or services is at your own risk.

C-CROP cannot and does not accept responsibility for the privacy policies of any such third party sites and such third-party websites are governed solely by such third parties' privacy policies and you are advised to be careful and check any such third party's privacy policies and compliance with laws, prior to supplying them with any of your personal data to them.

C-CROP is not responsible for content available by means of such third party sites. C-CROP does not endorse any information or products offered by third parties and we urge our users to exercise caution in using third-party services.

Data retention and deletion

C-CROP deletes (or equivalently irreversibly anonymizes) personal data where the purpose for which the data was being collected or processed ceases to apply, except the extent it is prohibited to do so under local, Israeli law (and in such cases only to the extent required) and/or or if applicable data protection rules require us to delete such personal data

However, we shall keep any portion of your personal data solely to the extent and only as long as necessary to continue providing your services under your subscription and/or for any legitimate and essential business interests, such as archiving any personal required to defend ourselves against any claim or suit and/or any other purposes required and necessary which C-CROP is entitled to under applicable law, such as the following circumstances:

- If there is an unresolved issue relating to your account, such as an outstanding credit on your account or an unresolved claim or dispute we will retain the necessary personal data until the issue is resolved;
- Where we are required to retain the personal data for our legal, tax, audit, and accounting obligations and/or regulatory requirements, we will retain the necessary personal data for the period required by applicable law; and/or,
- Where necessary for our legitimate business interests such as fraud prevention or to maintain the security of our users.
- Where necessary to cooperate with a criminal investigation by law enforcement agencies and/or any regulatory authority's inquiry and/or audit, in each such case solely subject to extent request and as per the applicable law.

The above notwithstanding, there are types of Personal Data we process will only be kept for as long as the original purpose of processing persists, such as your e-mail address and other information sent as part of a request or when browsing as long as your consent to usage of Cookies and Tracking Tools is intact. Where such a request has been withdrawn or sufficiently fulfilled and no longer relevant we shall delete such as part of our commitment to data minimization.

Note: We will also delete your Personal Data upon your expressed request to fulfill your request to fulfill your data subject right to deletion, subject to the limitations as stated herein above.

Transfer of Your Information:

We do not sell, trade, or otherwise transfer to outside parties your Personal Data, except as specifically stated in this Policy.

The above statement does not include trusted third parties who we are contracted with and which assist us in operating our services to your and/or our general business activities, provided they are related to permitted purposes stated herein above.

Further to the foregoing, prior to such transfers those parties are contractually obliged to keep your Personal Data confidential and to not use it for any purpose other than to fulfill their obligations to us in relation to the provision of our services to you.

Be advised that when transferring Personal Data to third-party contractors, C-CROP may need to share your information with subcontractors and other partners that are located in countries abroad which do not necessarily have the level of data protection in your jurisdiction.

We transfer our customers' Personal Data outside of the EEA or outside of a Country subject to a decision by the European Commission Adequacy Decision, only if it is strictly necessary, and in any such case we will only do so if we put in place a recognized, lawful data transfer legal instrument (e.g. Standard Contractual Clauses, EU approved Business Corporate Rules or Codes of Conduct, etc.)

Notwithstanding the above, all our subcontractors and other third parties will provide C-CROP with sufficient contractual obligations limiting their use of your Personal Data and subjecting their activities to appropriate data protection and privacy obligations in line with the applicable data protection obligations we have undertaken hereunder.

Be advised that We will fully cooperate with any law enforcement authorities or court order requesting or directing us to disclose the identity or behavior of any user suspected to have engaged in illegal behavior and thereby we may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others rights, property, or safety.

Finally and notwithstanding anything to the foregoing, C-CROP may share nonpersonally identifiable user information which cannot be linked back direct or indirectly to other parties for analytics, trends study, or other uses, as previously established is one of the purpose of use herein above.

Updates and Changes to this Data Protection and Privacy Policy

We may revise this Policy from time to time, and such changes shall come into effect from the moment C-CROP notifies you of such changes and/or updates, either by email, by notification on the Website, by a pop-up window the next time you use the App or in some other reasonable manner.

When we make material changes to this Policy, we'll provide you with prominent notice as appropriate under the circumstances, e.g., by displaying a prominent notice within the C-CROP website or by sending you an email message to that effect, prompting a re-consent window through the App.

<u>C-CROP's Cookies and Tracking Policy</u>

<u>NOTE</u>: For any issues of personal data protection, please refer to our Data Protection and Privacy Policy. For any questions regarding the collection, processing or use of personal data relating to you (as explained below) please contact our Data Protection Officer.

What's a cookie?

A cookie is a small file sent from a website or web-based interface, which is then stored by your web browser. When you return to the website or web-based interface, the information in the cookie can be used to recognize your last session. Cookies cannot install malicious software such as viruses on your device, and they do not store any of your personal data or account information.

Technologies that store or access information on a user's device are similar to cookies and also covered by this policy. In regard to C-CROP's activity we make use of:

- 1) "Session Storage" which is a means of storage of data in the local device's cache, for example to load content quicker during a single session which is deleted upon closing the browser.
- 2) "IndexedDB" which is client-side storage means for session and persistent information, used to retain and load data, which saves the data sets on the browser during the online session (and is "dumped"/deleted upon closing the browser)

Why do we use cookies?

We use cookies to save and maintain users' settings and selected preferences during browsing sessions, for saving repeating users' preferences for future use (e.g. geographical location, currency preferences accessibility and language selections and preferences), and for statistical analysis of the performance and trends on our website or interfaces and for monitoring and identifying errors.

Where do cookies come from?

Cookies originate from two types of sources: first party and third party. The classification whether a cookie is 'first' or 'third' party refers to the internet domain that is placing the cookie.

- <u>First-party cookies</u> are those set by a website that is being visited by the user at the time.
- <u>Third-party cookies</u> are cookies that are set by a domain other than that of the site being visited by the user. If a user visits a website and another entity sets a cookie through that site this would be a third party cookie.

Opt-out: When you first visit the Website, you will be given the option to accept or decline the use of cookies. You can also control the use of cookies at the individual browser level, and instructions for managing cookie usage can be found for the following browsers, at:

- <u>Google Chrome</u>
- Internet Explorer
- <u>Firefox</u>
- <u>Safari</u>
- Safari Mobile
- <u>Opera</u>

If you wish to opt-out of personalized or behavioral advertising, you can use an industry resource **in your region** that provides cookie choices, such as the tools provided by:

- the Digital Advertising Alliance (DAA),
- o the Digital Advertising Alliance of Canada (DAAC), and
- the European Interactive Digital Advertising Alliance (EDAA).

Be advised that if you elect to remove/block our cookies, you may still use the website or interface, but your ability to use some features or areas therein may be impaired, limited or unavailable and you hereby irrevocably and unconditionally waive any claim or demand if such an action results in any of the website or our services becoming unavailable, impaired or non-functional.

Do Not Track/Privacy Mode

"Do not track" or "privacy mode" is a function that allows website users to opt out of being tracked by websites for any purpose including the use of analytics services, advertising networks and social platforms.

Do not track options are available in a few browsers including:

- <u>Firefox</u>
- <u>Internet Explorer</u>
- <u>Chrome</u>
- <u>Safari</u>
- <u>Opera</u>

If you have enabled the "do not track" function in your browser, you will not be tracked, but this may impair your use of our website or interface. This is in addition to you opting out of the aggregation and analysis of data for the website and booking interface's statistics.

You hereby irrevocably and unconditionally waive any claim or demand if employing any of the aforementioned modes on your browser results in any of the services becoming unavailable, impaired or non-functional.

These Cookies can be classified for the following four purposes:

- **Necessary cookies** help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.
- **Statistic cookies** help website owners to understand how visitors interact with websites by collecting and reporting information anonymously

- **Preference cookies** enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in.
- **Marketing cookies** are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

What kind of third party cookies do we use?

Google Tag Manager

Our Website uses Google Tag Manager is a marketing solution which allows us to insert marketed website tags into our website and to manage them, and the Tag Manager tool itself (which implements the tags) is a cookie-less domain and does not register personal data.

The tag manager makes it easier for us to integrate and manage our tags. Tags are small code elements that are used to measure traffic and visitor behavior, capture the impact of online advertising and social channels, set up remarketing and target audience targeting, and test and optimize web pages

For more information on Google Tag Manager's terms of service and privacy policy, please visit <u>www.google.com/analytics/tag-manager/use-policy/</u>.

You may deactivate Google Tag Manager with the help of a browser add-on if you do not want this website analysis. This add-on can be downloaded at: <u>www.ghostery.com/</u>

Can I withdraw consent for the use of cookies or tracking tools?

If you wish to withdraw your consent, you can choose to opt-out of cookies at any time by managing and/or deleting your cookies using your internet browser settings.

Additional information on cookies in general:

A number of websites provide detailed information on cookies, including <u>AboutCookies.org</u> and <u>AllAboutCookies.org</u>.

Updates to our Policy

We update our Cookies Policy from time to time, if we introduce a new cookie or tracking tool which processes new information or wish to process the information collected by your cookies and tracing tools in a new manner, we shall notify you and ask you to consent to this updated processing or new cookie or tracking tool.

Questions?

Should you have any questions about the use of cookies by C-CROP, please be in touch with our Data Protection Officer ______.

The Cookies and Tracking Tools Deployed on our Website:

Name of Cookie	Provider	Purpose	Retention Period
SessionStorage	Java	Javascript Tracking Tool which saves input values from regular registers and enter it into honorary register inputs	Session

Cookies Banner Language

טקסט סטנדרטי לקוקיז מוצע יכול להיות באופן הבא:

Our website uses cookies and tracking tools to improve the usability and functionality of your browsing experience and for analytics and marketing purposes. By clicking on the "Allow all" button below, you hereby consent to our use of cookies and tracking and for their installation on your device.

For more information about the cookies used on our website, how to disable them or optingout from them, click on the "Read More" button.

[Insert "Read More" with a link to the Cookies and Tracking Policy] [Insert "Allow all" Button][Insert "Disallow All"][Customize]

הלון קוקיז סטנדרטי בדרך כלל מפלח את הקוקיז לפי הקטגוריות לעיל ומציג את האפשרויות באופן הבא <u>הלון קוקיז סטנדרטי בדרך כלל מפלח את הקוקיז</u> לפי הקטגוריות לעיל ומציג את האפשרויות באופן הבא (לאחר שלוחצים על "Customize)

Allow All				
Manage Consent Preferences				
+ Strictly Necessary Cookies	Always Active			
+ Analytics Cookies				
+ Functional Cookies				
+ Targeting Cookies				
Reject All				
Confirm My Choices				