

**Primis**  
**Privacy Notice**

*Recently Updated: December 2018*

Primis Ltd. (“**Primis**” or “**us**”), is committed to your right to privacy.

This Privacy Notice (“**Privacy Notice**”), is an integral part of our Terms of Use, which can be found at: <https://www.primis.tech/publishing-agreement-general-tc/> , and governs the processing and transfer of Personal Data collected in connection with our website, available at: www.primis.tech (“**Website**”) or tools, sites and services otherwise provided by Primis (collectively, “**Services**”), to each person (the “**User**” or “**you**”) accessing or using the Website and/or the Services.

If you choose to use the Services, interact with the Website, or otherwise provide data to us, you explicitly agree to the use of such data in accordance with this Privacy Notice. You may not use the Services or the Website or submit any data through them if you do not agree to any of the terms hereunder. This Privacy Notice shall not be construed in any manner to derogate from the Terms of Use or any other agreement or understanding between Primis and you.

Please note, that the Website and/or Services may contain links to other websites, products or services offered by third parties, which are not governed by this Privacy Notice. This Privacy Notice does not apply to the practices of entities which are not controlled by Primis.

If you are a client of Primis, please note that additional terms may be applicable to you in connection with the processing of Personal Data by you regarding your users and customers, as further specified in the relevant Data Processing Agreement.

**THE HIGHLIGHTS:**

- **You are not required by law to provide us with any Personal Data. Sharing Personal Data with us is entirely voluntary.**
- **Our Services are intended for Users over the age of 16 or equivalent minimum age for providing consent to processing of Personal Data in the relevant jurisdiction. Children under such age are not permitted to use the Services. If you are under such age you should cease to use the Services immediately.**
- **You may be entitled under applicable law to request to review, amend, erase or restrict the processing of your Personal Data. Please note that in case you request to erase or restrict the processing of your Personal Data, your use of the Services may be restricted or disabled.**
- **We do not sell, trade, or rent Users' Personal Data to third parties. We only share Personal Data with third parties in connection with the provision of the Services to our Users, or other limited circumstances as specified herein.**
- **If you have any questions or requests regarding the processing of your Personal Data, or would otherwise like to contact us in connection with this Privacy Notice, please send us an email to: [privacy@primis.tech](mailto:privacy@primis.tech).**

*1. What is Personal Data, and what data is collected about me by Primis?*

“**Personal Data**”, means any information which identifies or can be used to identify a natural person, including, but not limited to, first and last name, phone number, email address, IP address, billing information, etc.

#### Non-Personal Data

We collect non-Personal Data regarding Users concerning their use of the Website and Services, such as the scope, frequency, latency, pages accessed, what and when a User views or interacts with content and materials displayed through our Services, device identifiers, and other technical information regarding the device used to access the Services, such as model, operating system, etc.

We also use third-party advertising companies to serve ads when you visit our Web site. These companies may use aggregated information (not including your name, address, email address or telephone number) about your visits to this and other Web sites in order to provide advertisements about goods and services of interest to you. If you would like more information about this practice and to know your choices about not having this information used by these companies, please see: <http://live.sekindo.com/utills/cookieOptOut.php>

#### Personal Data

- 1.1. When you register on the Website, you will be requested to provide certain Personal Data, such as full name, e-mail address, the name of your employer, your title, phone number, country of residence and your website’s URL.
- 1.2. When you use the Services, whether as a publisher, an advertiser or any other user, Primis may collect additional information, such as session duration, page impressions, advertisements viewed or clicked on, Internet protocol (IP) address, the domain name that served you to access the Service, and the geographic location of the computer system that you are using to log-in to, or access the Services. Primis also collects additional data regarding your use of the Services, such as the frequency and the extent of your use.
- 1.3. If you contact us on various customer support issues of other matters, we may also collect data associated with these communications.
- 1.4. We do not knowingly collect or process any Personal Data included in Special Categories of Personal Data (as defined in the GDPR). In the event you become aware that such data has been posted to the Website or collected by us, please inform us immediately.
- 1.5. We may also access Personal Data about you which was made publicly available by you, for example on social networks, public websites, etc.

#### “Advertisements Monitoring”

- 1.6. As part of the operation of the Service, Primis will monitor and collect data about the access and use of advertisements that publishers embed on their websites through the use of the Service, and will further monitor the redirection of users from such advertisements to the advertisers’ websites and web pages (collectively: “**Advertisements Monitoring**”). You hereby grant your explicit, irrevocable and unconditional consent to the Advertisements Monitoring. Furthermore, you warrant and represent that you will apply to your website any and all privacy practices with respect to the Advertisements Monitoring, as required under the applicable law, including by providing a proper notification to users of your website, and/or obtaining users' documented consent to such collection and processing of data.
- 1.7. You undertake that you will process Personal Data regarding users or other data subjects only as lawful and compliant with applicable law, including, if applicable, the GDPR, and that you are solely

responsible to implement measures ensuring and demonstrating that such processing is made in compliance therewith.

- 1.8. You undertake to defend, indemnify, and hold harmless Primis, and its officers, directors, employees, successors, and agents, immediately after receiving a written notice from Primis, from all claims, damages, liabilities, assessments, losses, costs, administrative fines and other expenses (including, without limitation, reasonable attorneys' fees and legal expenses), arising out of or resulting from any claim, allegation, demand, suit, action, order or any other proceeding by a third party (including supervisory authorities) that arises out of or relates to a violation of your representations and/or obligations under this Notice and/or applicable laws.

## **2. *What will Primis do with my data?***

- 2.1. Non-Personal Data. Non-Personal Data is used mainly for click stream analysis in order to constantly improve and maintain our Website and Services, including among others, in order to measure and understand the level of engagement to our services, for general business analytics and in order to provide a more personalized experience and tailored content, for ensuring the technical functioning of our network, to help prevent fraudulent use of our Services and for developing new services and features.
- 2.2. Personal Data. Personal Data is used only for the following limited purposes:
  - 2.2.1. To provide you with the Services, process transactions, and collect fees.
  - 2.2.2. To resolve any disputes, communicate with you regarding customer service and support issues, and to respond to questions or comments and help resolve any problems.
  - 2.2.3. To prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity thefts and any other misuse of the Website or the Service and to enforce our Terms of Use.
  - 2.2.4. To protect the security or integrity of our databases and the Services, and to take precautions against legal liability.
  - 2.2.5. To improve the Services, and to develop new features, products and services.
  - 2.2.6. To improve your experience on the Website and customize our Services to your interests, including by way of targeted advertising.
  - 2.2.7. For the purposes of our legitimate interests, to the extent not overridden by the rights and freedoms of natural persons, as permitted under applicable law.
  - 2.2.8. To provide updates with respect to material changes to this Privacy Notice or our Terms and Conditions.

## **3. *Does Primis use cookies?***

Yes, we use data files such as cookies, pixel tags, “Flash cookies,” or other local storage files provided by your browser or associated applications (“**Cookies**”). We use these technologies in order to recognize you as a customer; customize our Services, content, and advertising; measure promotional effectiveness; help ensure that your account security is not compromised; mitigate risk and prevent fraud; and to promote trust and safety across our sites and Primis Services.

Our main advertising cookies are prefixed with ‘v’ (e.g. v12345) and are stored in browsers under the domain primis.tech or Sekindo.com We also use ‘c’, ‘l’, ‘t’, ‘spc’, ‘spshc’, ‘fr’, ‘ps’, ‘n’, ‘e’, ‘sid’, ‘udi’, ‘dp4’ and ‘fro’ prefixed cookies (e.g. spc12345), and/or CSUUID

We use both session and persistent Cookies. Session Cookies expire and no longer have any effect when you log out of your account or close your browser. Persistent Cookies remain on your device until you erase them or they expire.

You may also encounter Primis Cookies on websites that we do not control. Likewise, certain third parties may place their own Cookies in the Website and Services. Such third party Cookies are not subject to our control and this Notice does not cover them. If you are located in the EEA when accessing our Website, the use of Persistent and third party cookies will comply with the laws applicable to you.

You may at any time program your browser to block cookies, but please be aware that such blocking may prevent us from providing some or all of the Services to you. These cookies help us track how visitors use the Website and our Services.

#### **4. *How Can I Control My Personal Data?***

- 4.1. **Reviewing and amending your Personal Data.** If you are a registered to the Services, you may review the information included in your account on the Website. You may also send us a request in connection with reviewing your Personal Data to: [privacy@primis.tech](mailto:privacy@primis.tech). In the event any Personal Data is incorrect or outdated, you may update and correct such data by providing us with appropriate notification or correcting the data directly on the Website, as applicable to you. False, incorrect, or outdated information may prevent you from registering to the Services, or impair Primis' ability to provide you with the Services.
- 4.2. **Right of erasure and restriction.** You may also be entitled request the erasure or the restriction of your Personal Data, and we will comply with such requests, to the extent required under applicable law.
- 4.3. **Portability of Personal Data.** To the extent relevant to you and to the Services, you may be entitled to request the portability of your Personal Data, and we will comply with such requests, to the extent required under applicable law.
- 4.4. **Retention of Data.** We reserve the right to retain any Personal Data for as long as reasonably necessary in order to: (i) fulfill the purposes described herein; (ii) in the defense or assertion of legal claims and liability; (iii) for the analysis and development of the Services; and (iv) to comply with applicable law. Non-Personal Data and statistical anonymized data may be retained by us without limitation.

#### **5. *Will Primis Share My Personal Data With Others?***

**WE DO NOT SELL OR RENT ANY OF YOUR PERSONAL DATA TO NON-AFFILIATED THIRD PARTIES FOR THEIR MARKETING PURPOSES.**

- 5.1. Non-Personal Data, aggregate and statistical or otherwise anonymized data may be shared without limitation with third parties at our discretion. This information does not contain Personal Data and is used to develop content and services for our Users and clients.
- 5.2. We share Personal Data only under the following limited circumstances:
  - 5.2.1. With trusted partners and third parties who assist us in operating the Services and conducting our business, such as fraud prevention, bill collection, account maintenance, marketing and technology services.

- 5.2.2. For personalizing your experience of the Services, including by way of targeted advertising on the Website.
- 5.2.3. As necessary to help detect and prevent potentially illegal acts and fraud, and to guide decisions about products, services and communications.
- 5.2.4. With Primis' affiliates and connected companies, such as subsidiaries, sister-companies and parent companies.
- 5.2.5. To comply with a legal requirement, for the administration of justice, to protect your vital interests or the vital interests of others, to protect the security or integrity of our databases or the Services, to take precautions against legal liability, or in the event of a corporate sale, merger, reorganization, dissolution or similar event.
- 5.2.6. Other third parties with your consent or direction to do so.

**6. *What is the lawful basis under which Primis processes Personal Data?***

- 6.1. Certain processing activities conducted by us are based on the necessity of such activities for the performance of our Services and the contract between us and our Users.
- 6.2. Other processing activities are based on the grounds that they are necessary for the purposes of our legitimate interests or the legitimate interests of a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of natural persons which require protection of Personal Data.
- 6.3. There may be certain processing activities based on your consent. In connection with such activities, you may rescind your consent, by sending us an email to: [privacy@primis.tech](mailto:privacy@primis.tech). Please note that in the event you rescind your consent to the processing of Personal Data, we may not be able to provide you with some or all of the Services.

**7. *Will Primis transfer my Personal Data internationally?***

Our databases are currently located in the Netherlands and the U.S. Some of our processing activities are made in Israel. The European Commission has decided that the State of Israel ensures an adequate level of privacy and data protection, therefore, in accordance with the GDPR, the transfer of Personal Data from the EU to Israel is lawful and does not require any specific authorization.

Any other transfer of Personal Data originating from the EU to a third country (other than Israel) shall be made in accordance with applicable law, including by providing adequate protections, or otherwise implementing appropriate safeguards to ensure the protection of our Users' rights.

**8. *Will I receive promotional materials from Primis?***

Primis may send you offers that may be of special interest to you via email or SMS. You may unsubscribe from receiving such communications at any time, by sending us a notification to: [privacy@primis.tech](mailto:privacy@primis.tech), or following the instructions for unsubscribing included in such communications.

We may also engage with third parties to track and report performance of advertising and marketing campaigns to and from Primis and third party web sites. We may combine your information with information we collect from third parties and use it to improve and personalize our Services, content, and advertising.

**9. *Persons under 16***

Our Website is a general audience Website, which is not directed to persons under 16 years old. If a parent or guardian becomes aware that his/her child has provided us with Personal Data without their consent, he/she should contact us immediately. We do not knowingly collect or solicit Personal Data from people under 16 years old. If we become aware that a person under 16 years old has provided us with Personal Data, we will delete such data from our databases.

#### ***10. Applicable Laws***

The provisions included in this Notice relating to matters regulated under the GDPR will apply only to the processing of Personal Data which is subject to the GDPR in accordance with the applicability provisions contained therein. If the GDPR does not apply to the processing of your Personal Data, some of the provisions above may not apply to you.

#### ***11. Questions or concerns regarding privacy***

If you have any questions or concerns regarding privacy issues, please send us a detailed message to [privacy@Primis.tech](mailto:privacy@Primis.tech) and we will make every effort to resolve your concerns without delay.

Primis may, at any time and from time to time, modify this Privacy Notice. Modifications to this Privacy Notice will be posted on the Website, and shall be effective as of the date in which they are posted on the Website.

You are also entitled to file a complaint with the appropriate supervisory authority in connection with concerns you may have with regards to your privacy and Personal Data.