

S. D. SIGHT DIAGNOSTICS LTD. WEBSITE PRIVACY POLICY

Last Updated: June, 2020

*This privacy policy (“**Privacy Policy**”) governs how we, S.D. Sight Diagnostics Ltd. (together, “**Sight Diagnostics**” “**we**”, “**our**” or “**us**”) use, collect and store Personal Data we collect or receive from or about you (“**User**”, “**you**”) when you make use of, interact or visit our website, <https://www.sightdx.com/> (“**Website**”) and/or when you contact us.*

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest of user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to Personal Data. “Personal Data” means any information that can be used, alone or together with other data, to uniquely identify any living human being. Please note that this is a master privacy policy and some of its provisions only apply to individuals in certain jurisdictions. For example, the legal basis in the table below is only relevant for GDPR-protected individuals.

Table of contents:

1. [What information we collect, why we collect it, and how it is used](#)
2. [How we protect and store your personal data](#)
3. [How we share your personal data](#)
4. [Additional information regarding transfers of personal data](#)
5. [Your rights](#)
6. [Use by children](#)
7. [Links to and interaction with third party product](#)
8. [Log files](#)
9. [Cookies and other tracking technologies](#)
10. [Analytic tools](#)
11. [California privacy rights](#)
12. [How to contact us](#)

This Privacy Policy can be updated from time to time and therefore we ask you to check back periodically for the latest version of the Privacy Policy, as indicated below. If there will be any significant changes made to the use of your Personal Data in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

1. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

Data we collect	Why is the data collected and for what purposes?	Legal basis (GDPR only)	Third parties with whom we share your data	Period of storage or criteria to determine period of storage	Consequences of not providing the data
<i>When you browse or visit our Website</i>					
<ul style="list-style-type: none"> • Cookies, Analytic tools and/or Log files. 	<ul style="list-style-type: none"> • Marketing purposes, usage analytics and statistics, improving quality of service 	<ul style="list-style-type: none"> • Legitimate interest (e.g. essential cookies) 	<ul style="list-style-type: none"> • 3rd party platforms such as: Analytics - Google Analytics, Server logs - Heroku. 	<ul style="list-style-type: none"> • The data will be stored for a minimal period of time according to our record control policies. Sight will proactively delete the data as soon as the data is no longer needed, or when you send a deletion request, all in accordance with data retention laws. 	<ul style="list-style-type: none"> • For logs - Cannot use or access the Website. • For analytics - cannot use and access the entire website.
<i>When you contact us through our Website (e.g. contact sales, submit a request)</i>					
<ul style="list-style-type: none"> • Full name • Email address • Facility Name and Type • Phone number (optional) • Country (optional) • Specialty (optional) • Message 	<ul style="list-style-type: none"> • To process and answer questions • To process and answer commercial inquiries 	<ul style="list-style-type: none"> • Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract 	<ul style="list-style-type: none"> • 3rd party platforms such as for the following purposes: Hubspot - CRM and marketing platform. • Gmail - for notification and communication. • Slack - for notifications. • Google Drive and Airtable - for internal processes 	<ul style="list-style-type: none"> • The data will be stored for a period of time according to our record control policies. Sight Diagnostics will proactively delete the data as soon as the data is no longer needed, or when the data subject sends a deletion request, all in accordance with data retention laws. 	<ul style="list-style-type: none"> • Cannot process, assist and answer your query • Cannot process and answer your commercial questions

Any other information that you decide to provide/supply us		<ul style="list-style-type: none"> • Legitimate interest (e.g. respond to a query sent by you) 			
<i>When you submit a job application through our Website</i>					
<ul style="list-style-type: none"> • Full name • Email address • Phone number • CV • Message • Any other information that you decide to provide/supply us with 	<ul style="list-style-type: none"> • To process your job application • To assess the candidate 		<ul style="list-style-type: none"> • Processing is necessary to take steps at the request of the data subject prior to entering into a contract • Legitimate interest (e.g. to process your job application) 	The data will be stored for a period of time according to our record control policies. Sight Diagnostics will proactively delete the data as soon as the data is no longer needed, or when the data subject sends a deletion request, all in accordance with data retention laws	<ul style="list-style-type: none"> • Cannot process your job application • Cannot assess your suitability as a candidate

Finally, please note that some of the abovementioned Personal Data will be used for fraud detection and prevention, and for security purposes.

2. HOW WE PROTECT AND STORE YOUR INFORMATION

2.1. **Security.** We have implemented appropriate technical, organizational and security measures designed to reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to such information appropriate to the nature of the information concerned. However, please note that we cannot guarantee that the information will not be exposed as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.

2.2. Retention of your Personal Data. In addition to the retention periods mentioned in Section 1 above, in some circumstances we may store your Personal Data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings.

3. ***HOW WE SHARE YOUR PERSONAL DATA***

In addition to the recipients described in Section 1, we may share your information as follows:

- To the extent necessary, with regulators, to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- If, in the future, we sell or transfer some or all of our business or assets to a third party, we will (to the minimum extent required) disclose information to a potential or actual third party purchaser of our business or assets. In the event that we are acquired by or merged with a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer or assign Personal Data in connection with the foregoing events.
- Where you have provided your consent to us sharing the Personal Data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality); and
- Where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any Personal Data is disclosed.

If you want to receive the list of recipients of your Personal Data, please make your request by contacting us at support@sightdx.com.

4. ***ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL DATA***

- Storage: We store our data in: (i) HubSpot (ii) Gmail (iii) Google Drive; Slack and (iv) Airtable.
- Access from Israel: Access from Israel is covered by the European Commission's Adequacy Decision regarding Israel. You can read more here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en.
- Access from UK: Access from the EU, no transfer mechanism is required.

- Internal transfers: Transfers within the Sight Diagnostics group will be covered by an internal processing agreement entered into by members of the Sight Diagnostics group (an intra-group agreement) which contractually obliges each member to ensure that personal data receives an adequate and consistent level of protection wherever it is transferred to.
- External transfers: When we transfer your personal data outside of EU/EEA (for example to third parties who provide us with services), we require assurance that they protect your personal data. Some of these assurances are well recognized certification schemes like the EU - US Privacy Shield for the protection of Personal Data transferred from within the EU to the United States.

5. ***YOUR RIGHTS***

The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by the GDPR):

- You have a right to access information held about you. Your right of access may normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
- You have the right to request that we rectify any Personal Data we hold that it is inaccurate or misleading;
- You have the right to request the erasure of the Personal Data that relates to you. Please note that there may be circumstances in which we are required to retain your data, for example for the establishment, exercise or defense of legal claims;
- The right to object, to or to request restriction, of the processing. However, there may be circumstances in which we are legally entitled to refuse your request;
- The right to data portability. This means that you may have the right to receive your Personal Data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
- You have the right to object to profiling;
- You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place of work or place of alleged infringement) at any time. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority;
- The right to withdraw your consent. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations.
- You also have a right to request details of the basis on which your Personal Data is transferred outside the European Economic Area, but you acknowledge that data transfer agreements may need to be partially redacted for reasons of commercial confidentiality.

You can exercise your rights by contacting us at privacy@sightdx.com. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm your identity and for security purposes, before disclosing the Personal Data requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

6. *USE BY CHILDREN*

We do not offer our products or services for use by children. If you are under 18, you shall not use the Website, or provide any information to the Website without involvement of a parent or a guardian. We do not knowingly collect information from, and/or about children.

7. *LINKS TO AND INTERACTION WITH THIRD PARTY PRODUCTS*

The Website enables you to interact with or contain links to your Third Party Account and other third party websites, mobile software applications and services that are not owned or controlled by us (each a “**Third Party Service**”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect Personal Data from you. Accordingly, we encourage you to read the terms and conditions and privacy policy of each Third Party Service that you choose to use or interact with.

8. *LOG FILES*

We make use of log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us. We use such information to analyze trends, administer the Website, track users’ movement around the Website, and gather demographic information.

9. *COOKIES AND OTHER TRACKING TECHNOLOGIES*

Our Website utilizes “cookies”, anonymous identifiers and other tracking technologies in order for us to provide our Website and present you with information that is customized for you. A “cookie” is a small text file that may be used, for example, to collect information about activity on the Website. Certain cookies and other technologies may serve to recall Personal Data, such as an IP address, previously indicated by a user. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser.

10. *ANALYTIC TOOLS*

Google Analytics. The Website uses a tool called “**Google Analytics**” to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google’s ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <http://www.google.com/analytics/terms/us.html/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You

may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.

11. CALIFORNIA PRIVACY RIGHTS

California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of Personal Data to third parties for their direct marketing purposes. To make such a request, please send an email to support@sightdx.com. Please note that we are only required to respond to one request per customer each year.

12. CONTACT US

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at support@sightdx.com
