

## PRIVACY POLICY

[Last modified: October 11, 2020]

### INTRODUCTION

TIM Adtech Ltd. (“us”, “our”, “we” or “Company”) is the owner and developer of proprietary technology and integration intended to convert articles and similar content to audio (“Technology”). The technology is implemented by Company’s business partners in their websites or other digital assets (“Business Partners” and “Digital Assets” respectively), enabling their Digital Assets’ end user (“Users”) to listen to the content available therein. The Company also allows for third party advertisers (“Advertisers”) to provide advertisements (“Ads”) through its Technology (collectively with the Technology, “Services”).

This privacy policy (“Privacy Policy”) governs our privacy and data collection practices with respect to the data we collect from individuals who access and use our website available at: [trinityaudio.ai](https://trinityaudio.ai) (“Visitors”), our Business Partners who use and register for our Services and their Users interacting with the Technology. Each of the Business Partners, Users, and Visitors shall also be referred to herein as “you”.

This Privacy Policy will explain what information we may collect from our Visitors, Business Partners and their Users, how such information may be used or shared with others, how we safeguard it and how each of the aforementioned individuals may exercise their rights related to their Personal Data (as such term is defined below) in accordance with applicable data protection laws including, but not limited to, the EU General Data Protection Regulation (“GDPR”) and the California Consumer Privacy Act (“CCPA”). We highly encourage you to read the Privacy Policy carefully and use it to make informed decisions before you access our Website or use any of our Services.

**If you are a California resident, the CCPA may apply to you as well. Please review our [CCPA Privacy Notice](#) to learn more.**

This Privacy Policy will include, but is not limited to, the following information:

- (i) Our lawful basis for processing your Personal Data;
- (ii) What type of data we collect and how we use such data;
- (iii) Cookies and how we collect your data;
- (iv) With whom we share your data and for what purpose;
- (v) Your privacy rights;
- (vi) Our data retention practices;
- (vii) Our direct marketing practices;
- (viii) How we protect your data;
- (ix) International transfer of your data;
- (x) Children;
- (xi) How to contact us;

### LAWFUL BASIS

**Subject to applicable law (and specifically the GDPR), our lawful basis for processing Personal Data is as follows:**

- (i) We process certain Online Identifiers (as described below) during a Visitor’s use of our website and for functionality and operational purposes, which we have a **legitimate interest** in processing;
- (ii) We process a Business Partner’s Personal Data when they use our Services in order to perform our **contract** with them;
- (iii) We (or the Advertisers) may use cookies for advertising purposes, which, subject to applicable law requirements, your consent will be requested by the Business Partners in order for us to do so; and
- (iv) In the event you contact us, we will process your contact details and other information you choose to provide us with in order to perform our **contract** with you.

**WHAT TYPE OF DATA DO WE COLLECT?**

If you are a Visitor, User or Business Partner, we may collect one or both of the following types of data from you when you use or access our website, the Services or when you interact with the Technology, as applicable.

The first type of data is aggregated, non-personal, non-identifiable information pertaining to your use of the website or interaction with the Technology (“**Non-personal Data**”). We are not aware of the identity of the individual from which the Non-personal Data is collected. Non-Personal Data may include your aggregated usage information and technical information transmitted by your device, including certain software and hardware information about your device (e.g., the device you use, the type of browser and operating system your device uses, language preferences, access times and the website’s domain name from which you accessed the Services, etc.), in order to enhance the functionality of the Services and for security and functionality purposes. We may also collect information about your activity on the Services (e.g., clicks, ads shown, etc.).

The second type of information is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual (“**Personal Data**”).

For the avoidance of doubt, if we combine Personal Data with Non-personal Data, the combined data will be treated as Personal Data as long as the data types remain combined.

We act as a **Processor** of a User's Personal Data that we process on behalf of our Business Partners. We are considered to be the **Controller** of the Personal Data we collect from our Business Partners and Visitors.

**The types of data that we collect as well as our reasons for processing such data are specified in the tables below.**

**Data We Collect from Business Partners and Visitors:**

Type of Data	How Do We Use It?
<p><b>Data Provided Voluntarily:</b></p> <p>If you voluntarily contact us in any manner, whether via our contact form on our website, request a demo, via email, etc., you may be asked to provide us with your contact information such as your full name and email address as well as your Company</p>	<p>We will use this data solely for the purpose of responding to your inquiries and to provide you with the support or information you requested. We will retain our correspondence with you for as long as we find necessary, subject to applicable law.</p>

name and job title.	
<p><b>Business Partner's Registration:</b></p> <p>If you wish to partner with us and integrate to Technology within your Digital Assets you will be request to register and create an account. During the registration you will be requested to provide your contact details such as your name, email address, phone number, company name and payment details.</p>	<p>We will use this data to provide the Services and designate your account. Your contact details will be used in order to send you needed information related to our Services and our business engagement (e.g., send you a welcome message, notify you regarding any updates to our Services, send applicable invoices, etc.) and additional occasional communications and updates related to the Services, as well as provide you with tips related to our Services, and promotional and marketing emails. We may also use the information in order to verify your identity, including by send you a text message for password verification purposes.</p>
<p><b>Newsletter Subscription:</b></p> <p>If you voluntarily subscribe to our newsletter through our website (or otherwise agree to receive our updates and content), you may be requested to provide us with your contact information such as your name, email address and company name. You can unsubscribe at any time using the unsubscribe option within the body of the applicable email correspondence or by contacting us directly.</p>	<p>We use this data solely in order to provide you with the content that you requested to receive.</p> <p>The Company uses MailChimp for its email marketing services.</p> <p>Please review MailChimp's privacy policy here: <a href="https://mailchimp.com/legal/privacy/">https://mailchimp.com/legal/privacy/</a> for more information.</p>
<p><b>IP and Technical Data:</b></p> <p>When you access our website or interact with our Services, we may collect certain online identifiers (e.g. your IP address) as well as technical Non-Personal Data (e.g. the type of operating system, type of browser, device type, access time and date, directing URL and your approximate geographical location).</p>	<p>We use this data for our legitimate interests of: (i) operating, providing, maintaining, protecting, managing, customizing and improving our website and the way in which we offer it; (ii) enhancing your experience; (iii) auditing and tracking usage statistics and traffic flow; and (iv) protecting the security of our website.</p> <p>We will obtain your consent, if we are required to do so in accordance with applicable law when we use third party cookies on our website.</p>

**Data We Collect from Users:**

Type of Data	Purpose of Processing
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<p><b>Online Identifiers &amp; Technical Usage Personal Data:</b></p> <p>The Company may collect information regarding a User's interaction with the Services. Such information may include Online Identifiers such as the User's IP address, Advertising ID and IDFA. We may also assign a unique ID to your browser. The Company may also collect technical Data, such as, the type of operating system used, the type of browser, device type, access time and date, certain browsing data (e.g. directing URL) and the User's approximate geographical location.</p>	<p>We use this data for (i) operating, providing, maintaining, protecting, managing, customizing and improving our Services and the way in which we offer them as well as. In some cases, to provide Users with personalized Ads; (ii) enhancing your experience; and (iii) auditing and tracking usage statistics and traffic flow as well as calculating payments related to the Services, we provide to Business Partners.</p> <p>Where required under applicable law, we will require our Business Partner to obtain your consent to collect such data and share it with us.</p>
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**HOW WE COLLECT DATA**

Depending on the nature of your interaction with the website or the Services, the abovementioned data may be collected as follows:

- Voluntarily - In the event you choose to provide us with information, e.g., when you contact us or if you are a Business Partner and you choose to share other information with use via your use of the Services.
- Automatically – Your data may be collected automatically including via cookies (as explained below) and other similar tracking technologies.

We will ask for your consent to collect Personal Data and offer you the choice to opt-out of such collection if we are required to do so in accordance with applicable law.

**COOKIES**

We or our third-party affiliates (including Advertisers) may use cookies and other similar tracking technologies or methods of web and mobile analysis to gather, store, and track certain information related to your access of, activity and interaction with the Technology and website, as applicable.

A “cookie” is a small piece of information that a website assigns to your device while you access such website. Cookies are very helpful and may be used for a variety of different purposes. These purposes include, among other things, allowing you to navigate between pages efficiently, enabling automatic activation of certain features, remembering your preferences and making the interaction between you and the Services quicker, easier and smoother. Cookies are also used to help customize your experience and for advertising purposes (including personalized advertising). You can find out more information about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org).

In general, there are several types of cookies that may be used on our website or in our website and Services including the following:

- **Essential, Functionality, Operation & Security Cookies.** These cookies are essential for enabling user movement around the website, for the website and Technology, as applicable, to function properly, and for security purposes (i.e., used to authenticate users, prevent fraudulent use, and protect user data from unauthorized parties).

This category of cookies either cannot be disabled, or if disabled, certain features of the website or Services may not work.

- **Analytical, Measurement & Performance Cookies.** These cookies are used to collect information about how our website and Services are being used, in order to improve our Services and the way we offer them, as well as assess performance of the content and the way it is displayed on our website. These cookies enable us, for example, to assess the number of users who have viewed a certain page as well as their country of origin.
- **Targeting & Advertising Cookies.** These cookies are set by our third-party service providers, business partners, or Advertisers, as applicable. They may be to build a profile of your interests and show you personalized content and advertisements. They work by uniquely identifying your browser and device.

**The third parties' cookies used in our website are as follows:**

Cookie	Purpose	Privacy Policy and Opt-Out
Google Analytics	Analytical, Measurement & Performance Cookies	<a href="http://www.google.com/policies/privacy/partners">www.google.com/policies/privacy/partners</a> <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>
HubSpot	Functionality & Operation	<a href="https://mailchimp.com/legal/privacy/">https://mailchimp.com/legal/privacy/</a>
MailChimp	Functionality & Operation	<a href="https://legal.hubspot.com/privacy-policy?_ga=2.48898406.1547561739.1580054069-1042704558.1573974857">https://legal.hubspot.com/privacy-policy?_ga=2.48898406.1547561739.1580054069-1042704558.1573974857</a>

**The third parties' cookies used in our Technology are as follows:**

Cookie	Purpose	Privacy Policy and Opt-Out
Google Analytics	Analytical, Measurement & Performance Cookies	<a href="http://www.google.com/policies/privacy/partners">www.google.com/policies/privacy/partners</a> <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>
Adswizz	Targeting & Advertising Cookies	<a href="https://www.adswizz.com/our-privacy-policy/">https://www.adswizz.com/our-privacy-policy/</a> <a href="https://www.adswizz.com/cookie-policy/">https://www.adswizz.com/cookie-policy/</a>
Triton	Targeting & Advertising Cookies	<a href="https://www.tritondigital.com/website-privacy-policy">https://www.tritondigital.com/website-privacy-policy</a> <a href="https://www.tritondigital.com/privacy-policies">https://www.tritondigital.com/privacy-policies</a>
Targetspot	Targeting & Advertising Cookies	<a href="https://www.targetspot.com/privacy-policy/">https://www.targetspot.com/privacy-policy/</a>

In addition to the above, our Technology may include cookies placed by Advertisers, and will include Company's cookies required for functionality and operation, which expires every 12 months.

**Cookies Opt-Out:**

You can change your cookies settings at any time to control cookies placement through limiting or forbidding the website under which we provide the Services to place cookies on your device and to disable unwanted cookies already stored on your device, by changing your browser's privacy preferences (please visit the help pages of your web browser). Please note, however, that if you disable cookies or refuse to accept them, you might not be able to use all of the features we offer or some of the features may not function properly. You may not be able to store your preferences and some of our pages might not display properly. We may, at our sole discretion, delete old cookies after a certain time which no activity had occurred from a user.

Your web browser allows you to manage the cookies and your choices. The configuration for each browser is different. You may find more information about managing cookies on different web browsers below:

Browser	Relevant Link
Google Chrome	<a href="https://support.google.com/chrome/answer/95647?hl=en;">https://support.google.com/chrome/answer/95647?hl=en;</a>
Firefox	<a href="https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences;">https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences;</a>
Opera	<a href="https://help.opera.com/en/latest/security-and-privacy/;">https://help.opera.com/en/latest/security-and-privacy/;</a>
Internet Explorer	<a href="https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies;">https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies;</a>
Safari	<a href="https://support.apple.com/en-il/guide/safari/manage-cookies-and-website-data-sfri11471/mac;">https://support.apple.com/en-il/guide/safari/manage-cookies-and-website-data-sfri11471/mac;</a>
Edge	<a href="https://support.microsoft.com/en-us/help/4027947/windows-delete-cookies">https://support.microsoft.com/en-us/help/4027947/windows-delete-cookies</a>

You may also opt out of certain Advertisers' cookies and browser-enabled, interest-based advertising at the Network Advertising Initiative's ("NAI") website- [NAI consumer opt-out and](#) the Digital Advertising Alliance's ("DAA") website- [DAA opt-out page](#). Or the European Interactive Digital Advertising Alliance ("EDAA") website [Your Online Choices page](#).

Our Business Partners may also provide ways for you to opt out from or limit their collection of information from and about you. Please refer to the Business Partner's privacy policies. **Please note, however, that we are not responsible for the privacy practices of our Business Partners, and other third parties.**

#### **WHO DO WE SHARE DATA WITH AND WHY?**

We do **not** share your Personal Data with third parties except as specifically mentioned herein:

- **Third Party service providers** – we may disclose your Personal Data to third parties that perform services on our behalf (e.g. tracking, servers, service functionality and support, marketing, etc.). These entities may be located in a different jurisdiction than you and are prohibited from using your Personal Data for any purposes other than providing us with the requested services;
- **Third Party Rights** – we may share your Personal Data, solely to the extent needed to prevent harm to the rights (including intellectual property rights and other legal rights), property or safety of us, our Visitors, Business Partners and their Users, yourself or any other third party.
- **Policy Enforcement** – we may share your Personal Data, solely to the extent needed in order to enforce our policies including investigations of potential violations thereof, to establish or exercise our rights to defend against legal claims or to detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues;
- **Legal Requirement** – we may disclose or share your Personal Data, solely to the extent needed to comply with any applicable law, regulation, legal process or governmental request (i.e., to comply with a court injunction, etc.) or for the purpose of collaborating with law enforcement agencies; or
- **Affiliated Companies and Corporate Transaction**– we may share your Personal Data with a parent company, subsidiaries, joint ventures, or other companies under common control with the Company ("**Affiliated Companies**") solely if and when applicable or necessary. In addition, we may share information, in the event of a corporate transaction (e.g. sale, merger, consolidation, etc.), provided however, that our Affiliated Companies or acquiring company will be subject to the obligations detailed herein with respect to your Personal Data.
- **Online Identifiers** - we may share Online Identifiers with our Business Partners and advertising partners for the purpose of the Services, as well as to detect fraud and calculate payments.

### **THIRD-PARTY COLLECTION OF DATA**

Our Privacy Policy only addresses the use and disclosure of Personal Data that we collect from you. To the extent that you disclose your Personal Data to other parties via the Services (e.g., by clicking on a link to any other website or location) or via other websites throughout the internet, different rules may apply to their use or disclosure of the Personal Data you disclose to them and your Personal Data will be subject to that third-party's privacy policy.

You acknowledge that we are not responsible for third party's privacy practice related to or integrated with our Technology, including Business Partner and Advertisers, and that this Privacy Policy does not apply to any such third-parties' privacy practices. We strongly advise you to learn about the privacy practices of each website that you may visit before providing any Personal Data to such website.

## YOUR PRIVACY RIGHTS

Data protection and privacy laws may provide you with some of the following rights (depending on your jurisdiction) with respect to your Personal Data, which you may be able to exercise:

- The right to access your Personal Data;
- The right to ensure your Personal Data is accurate, complete and up to date;
- The right to have your Personal Data amended (by correcting, deleting or adding information);
- The right to object to the processing of your Personal Data;
- The right to send or “port” your Personal Data;
- The right to file a complaint with a supervisory authority in your jurisdiction; and
- The right to withdraw consent, subject to legal or contractual restrictions and reasonable notice;

Please review our [Privacy Rights Policy](#) to learn more.

In the event that you contact us and request to exercise any of the rights included above, we may request that you provide us with certain information in order to verify your identity and locate your data. This may take some time, subject to applicable privacy laws.

Please note that, you may have different rights than those which we listed above depending on the applicable privacy protection laws in your jurisdiction.

If you wish to exercise any or all of the above rights, please fill out the Privacy Rights Request (“PRR”) form available [here](#), and send it to our **privacy team at: [Privacy@trinityaudio.ai](mailto:Privacy@trinityaudio.ai)**.

Please feel free to contact our privacy team at: [Privacy@trinityaudio.ai](mailto:Privacy@trinityaudio.ai) as well if you wish to receive more information or you would like to raise a complaint with respect to how we may have handled your Personal Data

If you are not satisfied with our response or believe we are collecting or processing your Personal Data not in accordance with the applicable data protection laws in your jurisdiction, you may also have the right to submit a complaint with the applicable data protection authority in your jurisdiction.

## DATA RETENTION

We retain the information we collect for as long as needed to provide the Services and to comply with our legal obligations, resolve disputes and enforce our agreements (unless you instruct us otherwise).

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.

## DIRECT MARKETING

We may send our newsletter to our Business Partners who have registered to receive it. You can remove your Personal Data from our mailing list and stop receiving promotional communications from us by following the unsubscribe link located at the bottom of each communication or by emailing us at: [info@trinityaudio.ai](mailto:info@trinityaudio.ai).



Please note that we will still reserve the right to send you service-related communications, including service announcements and administrative messages that relate either to your account or to your transactions with the Services, even after you have chosen to unsubscribe from receiving our newsletter. You will only be able to opt out of receiving such messages by terminating and deleting your account with us. If you wish to delete your account, please contact us at the email address listed above. It is important that you are also aware, that we will still need to retain some of your Personal Data as required under applicable law or for the legitimate purpose of our business, even after you have chosen to delete your account.

## **HOW DO WE PROTECT YOUR DATA?**

We take great care in implementing and maintaining the security of the Services and your data. We employ physical, technical and administrative security measures that we believe comply with applicable laws and are in line with industry standards. We have instituted a variety of procedures and policies to ensure the safety of your data, and prevent unauthorized use of any such data. Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorized access or abuse the Services, and we make no warranty, express, implied or otherwise, that we will prevent such access.

If you feel that your privacy was not treated in accordance with our Privacy Policy, or if any person attempted to abuse the Services or acted in an inappropriate manner, please contact us directly at [privacy@trinityaudio.ai](mailto:privacy@trinityaudio.ai). Additionally, we will make a reasonable effort to notify you and the appropriate authorities (if required by applicable law) in the event that we discover a security incident related to your Personal Data.

## **DATA STORAGE**

The Company currently uses Amazon Web Services (AWS) as a cloud and storage service provider. AWS's terms of service are available here: <https://aws.amazon.com/service-terms/> and its privacy policy is available here: <https://aws.amazon.com/privacy/>.

## **INTERNATIONAL TRANSFER**

The Company provides Services worldwide and therefore, it may be necessary for us to transfer data, including Personal Data, to countries outside of your jurisdiction, including outside European Economic Area ("EEA"), where applicable. In these instances, we will take steps to ensure that a similar level of protection is given to your Personal Data, including through adequate contractual measures, as shall be required under applicable laws.

## **DO NOT TRACK DISCLOSURE**

Our website does not respond to Do Not Track signals. For more information about Do Not Track signals, please see: <http://www.allaboutdnt.com/>.

## **CHILDREN**

The website and Services are not directed or meant to be used by children (the phrase "child" shall mean as such term is defined under applicable law or an individual that is less

than 16 years old). If you are under 16 years old, you should not access the website, use the Services, or provide any Personal Data to us.

We will immediately discard any Personal Data that we discover has been shared with us by a child. Please contact us immediately at: **Privacy@trinityaudio.ai** if you have any reason to believe that a child has shared any Personal Data with us.

## **AMENDMENTS**

We may revise this Privacy Policy from time to time, in our sole discretion. The revised Privacy Policy will go into effect immediately upon its implementation on our website. The last revision date will be reflected in the "Last modified" heading located at the top of the Privacy Policy. We will make a reasonable effort to notify you in the event of any material changes to our privacy practices. We encourage you to review this Privacy Policy regularly for any changes so that you can continue to stay up-to-date with all of our current privacy practices.

## **CONTACT US**

Please contact us if you have any questions regarding this Privacy Policy. You may contact us in one of the following ways:

- By sending an email to our Data Protection Officer at: **DPO@trinityaudio.ai**
- By regular mail at: **Privacy@trinityaudio.ai**

**TIM Adtech Ltd.**