

# Privacy Policy

Last updated: 10.06.2022

For the purposes set out in EU Regulation no. 679/2016 on the protection of natural persons with regard to the processing of personal data.

This Privacy Policy ("Policy") explains the information collection, use, and sharing practices of Gal-IV Ltd ("we," "us," and "our") – **UIC/PIC: 204750510; VAT No: BG204750510**

Unless otherwise stated, this Policy describes and governs the information collection, use, and sharing practices of Gal-IV Ltd with respect to your use of our website (www.galivltd.com) and the services ("Services") we provide and/or host on our servers.

Please carefully review this Privacy Policy. By using any part of the Services, you understand that your information might be collected, used, and disclosed as outlined in this Privacy Policy.

## Our Principles

Gal-IV Ltd has designed this policy to be consistent with the following principles:

- Privacy policies should be human readable and easy to find.
- Data collection, storage, and processing should be simplified as much as possible to enhance security, ensure consistency, and make the practices easy for users to understand.
- Data practices should meet the reasonable expectations of users.

## Information We Collect

We collect information in multiple ways, including when you provide information directly to us; when we passively collect information from you, such as from your browser or device; and from third parties.

## Information You Provide Directly to Us

We may collect any information you provide to us.

We may automatically collect certain information about the computer or devices (including mobile devices or tablets).

As described further below, we may collect and analyse

(a) device information such as IP addresses, location information (by country and city), unique device identifiers, IMEI and TCP/IP address, browser types, browser language, operating system, mobile device carrier information, and

(b) information related to the ways in which you interact with the Services, such as referring and exit web pages and URLs, platform type, the number of clicks, domain names, landing pages, pages and content viewed and the order of those pages, statistical information about the use of the Services, the amount of time spent on particular pages, the date and time you used the Services, the frequency of your use of the Services, error logs, and other similar information.

As described further below, we may use third-party analytics providers and technologies, including cookies and similar tools, to assist in collecting this information.

## *Cookies and Other Tracking Technologies*

We also collect data about your use of our website through the use of Internet server logs and online tracking technologies, like cookies and/or tracking pixels. A web server log is a file where website activity is stored. A cookie is a small text file that is placed on your computer when you visit a website, that enables us to: (a) recognize your computer; (b) store your preferences and settings; (c) understand the web pages of the Services you have visited and the referral sites that have led you to our Services; (d) enhance your user experience by delivering content specific to your inferred interests; (e) perform searches and analytics; and (f) assist with security administrative functions. Tracking pixels (sometimes referred to as web beacons or clear GIFs) are tiny electronic tags with a unique identifier embedded in websites, online ads and/or email, and that are designed to provide usage information like ad impressions or clicks, measure popularity of the Services and associated advertising, and to access user cookies. We may also use tracking technologies in our license buttons (if any)

and/or icons that you can embed on other sites/services to track the website addresses where they are embedded, gauge user interaction with them, and determine the number of unique viewers of them. If you receive email from us (such as the CC newsletter, campaign updates, or other ongoing email communications from CC), we may use certain analytics tools, such as clear GIFs, to capture data such as whether you open our message, click on any links or banners our email contains, or otherwise interact with what we send. This data allows us to gauge the effectiveness of our communications and marketing campaigns. As we adopt additional technologies, we may also gather additional information through other methods.

Please note that you can change your settings to notify you when a cookie is being set or updated, or to block cookies altogether. Please consult the "Help" section of your browser for more information. Please note that by blocking any or all cookies, you may not have access to certain features or offerings of the Services.

For more information about how we use cookies, please read our Cookie Policy.

## **How We Use Your Information**

We may use the information we collect from and about you to:

- Fulfill the purposes for which you provided it.
- Conduct analytics, research, and reporting, including to synthesize and derive insights from your use of our Services.
- Comply with the law and protect the safety, rights, property, or security of Gal-IV Ltd, the Services, our users, and the general public; and
- Enforce our Terms of Use, including to investigate potential violations thereof.

Please note that we may combine information that we collect from you and about you (including automatically collected information) with information we obtain about you from our affiliates and/or non-affiliated third parties, and use such combined information in accordance with this Privacy Policy.

We may aggregate and/or de-identify information collected through the Services. We may use de-identified and/or aggregated data for any purpose, including without limitation for research and marketing purposes.

## **When We Disclose Your Information**

We may disclose and/or share your information under the following circumstances:

### **Service Providers**

We may disclose your information with third parties who perform services on our behalf, including without limitation, event management, marketing, data storage, data analysis and processing, and legal services.

## **Legal Compliance and Protection of Creative Commons and Others**

We may disclose your information if required to do so by law or on a good faith belief that such disclosure is permitted by this Privacy Policy or reasonably necessary or appropriate for any of the following reasons: (a) to comply with legal process; (b) to enforce or apply our Terms of Use and this Privacy Policy, or other contracts with you, including investigation of potential violations thereof; (c) enforce our Charter including the Code of Conduct and policies contained and incorporated therein, (d) to respond to your requests for customer service; and/or (e) to protect the rights, property, or personal safety of Gal-IV Ltd our agents and affiliates, our users, and the public. This includes exchanging information with other companies and organizations for fraud protection, and spam/malware prevention, and similar purposes.

## **Legal Compliance**

We may need to use and disclose information in certain ways to comply with our legal obligations.

## **Consent**

Where required by law, and in some other cases where legally permissible, we handle information on the basis of consent. Where we handle your information on the basis of consent, you have the right to withdraw your consent; in accordance with applicable law.

## **Online Analytics**

We may use third-party web analytics services (such as Google Analytics) on our Services to collect and analyse the information discussed above, and to engage in auditing, research, or reporting. The information (including your IP address) collected by various analytics technologies described in the "Cookies and Other Tracking Technologies" section above will be disclosed to or collected directly by these service providers, who use the information to evaluate your use of the Services, including by noting the third-party website from which you arrive to our Site, analysing usage trends, assisting with fraud prevention, and providing certain features to you. To prevent Google Analytics from using your information for analytics, you may install the official Google Analytics Opt-out Browser Add-on.

### **Security Measures**

We have implemented technical, physical, and organizational security measures to protect against the loss, misuse, and/or alteration of your information. These safeguards vary based on the sensitivity of the information that we collect and store. However, we cannot and do not guarantee that these measures will prevent every unauthorized attempt to access, use, or disclose your information since despite our efforts, no Internet and/or other electronic transmissions can be completely secure.

### **Children**

The Services are intended for users over the age of 18 and are not directed at children under the age of 13. If we become aware that we have collected personal information (as defined by the Children's Online Privacy Protection Act) from children under the age of 13, or personal data (as defined by the EU GDPR) from children under the age of 16, we will take reasonable steps to delete it as soon as practicable.

### **Changes to this Privacy Policy**

We will continue to evaluate this Privacy Policy as we update and expand our Services, and we may make changes to the Privacy Policy accordingly. We will post any changes here and revise the date last updated above. We encourage you to check this page periodically for updates to stay informed on how we collect, use and share your information. If we make material changes to this Privacy Policy, we will provide you with notice as required by law.

### **Questions About this Privacy Policy**

If you have any questions about this Privacy Policy or our privacy practices, you can contact us at: [info@galivlt.com](mailto:info@galivlt.com).