

Elron Website Privacy Policy

Last Revised: November 26, 2019

Elron Electronic Industries Ltd, (“Company”, “we” or “Elron”) respects the privacy of the users (“User” or “you”) of its website at <https://www.elron.com/> (the “Site”) and is committed to protect the User's information. We believe that you have a right to know our practices regarding the information we may collect and use when you use our Site.

1. Your consent (important, please read carefully!)

BY ENTERING, ACCESSING OR USING THE SITE, YOU AGREE TO THE TERMS AND CONDITIONS SET FORTH IN THIS PRIVACY POLICY, INCLUDING TO THE POSSIBLE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION AS SPECIFIED HEREIN. **PLEASE NOTE: IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, PLEASE DO NOT ENTER TO, CONNECT TO, ACCESS OR USE THE SITE IN ANY MANNER.**

2. Which Information May We Collect on Our Users?

We may collect two types of data and information from our Users:

- a. The first type of information is non-identifiable and anonymous information (“**Non-personal Information**”). **We are not aware of the identity of the User from whom we have collected the Non-personal Information.** Non-Personal Information is any unconcealed information which does not enable identification of an individual User, and which is available to us when such User uses our Site. Non-personal Information which is being gathered consists of technical information, behavioral information and aggregated information, and may contain, among other things, the activity of the User on the Site, type of operating system, device type, User's 'click-stream' on the Site, keyboard language, screen resolution, time spent on various screens of the Site, etc. We also use third-party service providers such as Google Analytics to obtain detailed analytics on the User's behavior on the Site.
- b. The second type of information is individually identifiable information (“**Personal Information**”). **This information may identify an individual or may be of a private and/or sensitive nature.**
 - Personal Information consists of any personal details provided consciously and voluntarily by the User when registering for our news and updates which includes, *inter alia*, full name and e-mail address.

For avoidance of doubt, any Non-personal Information connected or linked to or associated with any Personal Information shall be deemed as Personal Information as long as such connection, linkage or association exists.

We do not collect any Personal Information from you or related to you without your approval, which is obtained, *inter alia*, through your acceptance of the Privacy Policy.

3. How Do We Collect Information on Our Users?

There are two main methods that we use:

- a. **We collect information through your entry, connection, access and/or use of the Site.** In other words, when you are using the Site, we are aware of it and may gather, collect and store the information relating to such usage (such as the Non-personal Information detailed above), either independently or through the help of our authorized third-party service providers as detailed below.
- b. **We collect information which you provide us voluntarily.** For example, we collect Personal Information when you register for our news and updates.

4. What are the Purposes of the Collection of Information?

Non-personal Information is collected in order to:

- Use it for statistical, analytical and research purposes and for customization, developing and improvement of our Site.

- Enhance the User's experience while using the Site.

Personal Information is collected in order to:

- Respond to your inquiry.
- Provide the User with materials, updates about Elron's activities and news regarding the topics that may be of an interest to you, etc.

5. Sharing Information with Third Parties

Elron will not share any Personal Information it collects with any third party, other than in the extreme circumstances as follows: (a) to satisfy any applicable law, regulation, legal process, subpoena or governmental request; (b) to enforce this Privacy Policy, including investigation of potential violations thereof; (c) to detect, prevent, or otherwise address fraud, security or technical issues; (d) to respond to claims that contact information (e.g. name, e-mail address, etc.) of a third-party has been posted or transmitted without their consent or as a form of harassment; (e) to protect the rights, property, or personal safety of the Company, its Users or the general public; (f) by virtue of undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of the assets of Company, so long as such acquirer maintains the same privacy terms hereunder; or (g) pursuant to your explicit approval prior to the disclosure. Note, that we collect, hold and/or manage your Personal Information through Elron's authorized third parties vendors of certain products or services (such as hosting cloud services) (including, as applicable, their affiliates) solely and limited to providing us with such requested services, and not for any other purposes. Such vendors may be located in a country that does not have the same data protection laws as your jurisdiction.

For avoidance of doubt, Elron may transfer and disclose **Non-personal Information** to third parties at its discretion including without limitation for statistical, analytical and research purposes.

6. Third Party Service Providers

While using the Site we may be using third party service providers, who may collect, store and/or process the information detailed herein. Elron uses commercially reasonable efforts to engage with third parties that post a privacy policy governing their collection, processing and use of non-personal and personal information. Such software may include without limitation:

- **Google Analytics** whose privacy policy can be found at: <http://www.google.com/intl/en/policies/privacy/>; and
- **Mailchimp** whose Privacy Policy can be found at <https://mailchimp.com/legal/privacy/>

Please read such third party service providers' terms of use and privacy policies to understand their privacy practices.

7. Links to Third Party Websites

Certain links provided herein permit our Users to leave the Site, and enter non-Elron sites or services (which may include but shall not be limited to Facebook, Google Maps, and LinkedIn and the sites of Elron's portfolio companies). Elron is not responsible or liable for such linked sites and services' privacy practices and/or any other practices. Your access to, use of and reliance upon any such sites, services and content and your dealings with such third parties are at your sole risk and expense. Those linked sites and services are provided solely as a convenience to you. Most of such linked sites and services provide legal documents, including terms of use and privacy policy, governing the use thereof. It is always advisable to read such documents carefully before using those sites and services, *inter alia*, in order to know what kind of information they are collecting.

8. Minors

The Site is intended for Users over the age of thirteen (13). Therefore, Elron does not intend and does not knowingly collect directly Personal Information from children under the age of thirteen (13) and does not wish to do so. We reserve the right to request proof of age at any stage so that we can verify that minors under the age of thirteen (13) are not using the Site.

9. News and Updates

You hereby agree that we may use your contact details you provided us with for the purpose of providing you non-commercial materials related to our current and/or future activities and our portfolio companies. You may withdraw your consent by sending a written notice to Elron's e-mail address that appears in the Site or alternatively follow the instructions for removing yourself from the mailing list which are available in the message transmitted to you.

10. Deletion or Modification of Personal Information

In the event that you wish to modify or delete the Personal Information you provided us via the Site, you can send us an e-mail of your request to: info@elron.com, and we will modify or delete your Personal Information pursuant to any applicable privacy laws. We will retain and use your Personal Information for a reasonable time after termination as necessary to comply with our legal or business requirements or obligations (including as required by applicable law), or to resolve disputes. Aggregate and/or anonymous data derived from your use of the Site may remain on Elron's servers indefinitely. Note that unless you instruct us otherwise we may retain your Personal Information for as long as required to provide you the information regarding our activities and our portfolio companies, all as permitted under any applicable privacy laws.

11. Security

We take reasonable measures to maintain the security and integrity of our Site and prevent unauthorized access to it or use thereof through generally accepted industry standard technologies and internal procedures. The Personal Information is hosted on the Mailchimp servers which provide advanced strict security standards (both physical and logical). In addition, we employ highly secure services design and implementation using state of the art encryption and architecture mechanisms. Furthermore, we implement a secure permission management and auditing system using specific and proprietary firewall and network access filtering as well as security group mechanisms. Please note, however, that there are inherent risks in transmission of information over the Internet or other methods of electronic storage and we cannot guarantee that unauthorized access or use will never occur. ELRON SHALL NOT BE RESPONSIBLE OR LIABLE FOR UNAUTHORIZED ACCESS, HACKING, OR OTHER SECURITY INTRUSIONS OR FAILURE TO STORE OR THE THEFT, DELETION, CORRUPTION, DESTRUCTION, DAMAGE, OR LOSS OF ANY DATA.

12. Changes to the Privacy Policy

The terms of this Privacy Policy will govern the use of the Site and any information collected therein. Elron reserves the right to change this policy at any time, so please re-visit this page frequently to check for any changes. In case of any material change, we will make reasonable efforts to post a clear notice on the Site or we will send you an e-mail regarding such changes to the e-mail address that you may have provided us with. Such material changes will take effect seven (7) days after such notice was provided on our Site or sent to you via e-mail, whichever is the earlier. Otherwise, all other changes to this Privacy Policy are effective as of the stated "Last Revised" and your continued use of the Platform on or after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes. In the event that the Privacy Policy should be amended to comply with any legal requirements, the amendments may take effect immediately, or as required by the law and without any prior notice.

13. Got any Questions?

If you have any questions (or comments) concerning this Privacy Policy, you are most welcome to send us an email to the following address: info@elron.com and we will make an effort to reply within a reasonable timeframe.