



**MEDCU TECHNOLOGIES LTD.**

**WEBSITE PRIVACY AND COOKIE POLICY**

**This website is operated by MedCu Technologies Ltd.**

*(All capitalized terms shall have the meanings ascribed to them in the full privacy policy below.)*

MedCu's privacy policy (the "**Privacy Policy**" or "**Policy**") explains our practices for processing Personal Information on our Website.

We are committed to protecting privacy and processing Personal Information fairly and lawfully in compliance with applicable data protections laws. You can access our full Privacy Policy below to help you understand better how we collect and use your Personal Information. The Policy details the types of Personal Information we collect on our Website, how we collect it, what we may use it for, who we may share it with, how long we may keep it for and what are your rights in relation to your Personal Information.

Read this policy and make sure you fully understand our practices in relation to your Personal Information, before you access or use the Website. If you read and fully understand this Privacy Policy, and remain opposed to our practices, you must immediately leave this Website, and avoid or discontinue all use of the Website. If you have further questions or concerns regarding this policy please contact us at: [DannyL@MedCu.com](mailto:DannyL@MedCu.com).



## FULL PRIVACY POLICY

### 1. Definitions

- 1.1. “**Applicable Laws**” shall mean the GDPR; European Union Member State laws, rules and guidelines implementing or supplementing the GDPR, as amended from time to time and to the extent applicable to MedCu; and any other applicable privacy or other law to the extent applicable to MedCu.
- 1.2. “**EEA**” shall mean the European Economic Area.
- 1.3. “**GDPR**” shall mean Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation), and as amended, replaced or superseded from time to time.
- 1.4. “**Information**” - shall mean Non-PII and PII, together.
- 1.5. “**MedCu**”, “**we**”, “**us**”, “**our**” shall mean MedCu Technologies Ltd.
- 1.6. “**Non-PII**” or “**Anonymized Information**” shall mean any information, data or content, in any format or media, which is anonymous and/or does not personally identify you as an individual and/or cannot be attributed to you as an individual (such as your browser type). We may use some electronic tools to collect Non-PII, as detailed in Section 3 below.
- 1.7. “**Personal Information**” or “**PII**” shall mean any information, data or content, in any format or media, which can personally identify you as an individual (such as your name, e-mail address, phone number), or as otherwise defined as such in applicable law.
- 1.8. “**Terms of Use**” shall mean the terms which govern your use of the Website [available here](#).
- 1.9. “**Visitor**”, “**you**”, “**yours**” shall mean a natural person who enters our Website.
- 1.10. “**Website**” shall mean the website owned and operated by MedCu available at <https://www.medcu.com/>.
- 1.11. The terms “**Data Subject**” “**Controller**”, “**Processor**”, “**Processing**”, “**European Commission**”, “**International Organization**” and “**Supervisory Authority**” shall have the meanings ascribed to them in the GDPR.

### 2. Collection of Personal Information

- 2.1. General: The collection of PII commences on the first use of the Website. We collect PII for the purposes detailed in Section 4 below.
- 2.2. PII you may provide us: We collect PII from the information you provide us on the Website. In order to submit the “contact us” online form on our Website, you are required to provide your name and email address, and you may also voluntarily provide us your workplace/organization, telephone number and further details of your choice through the “free text” box, or to our company email address. These means of communication are intended to allow us to contact you and respond to your inquiries. Please note that at all times, you may choose whether or not to provide or disclose



Personal Information and please do not provide any more PII than is needed for us to contact you.

- 2.3. PII we collect or generate: We may use technological tools (detailed in Section 5 below) through which we may collect the following PII: persistent identifiers such as IP addresses and your Geo location through the use of “cookies”.

### 3. **Anonymized Information**

- 3.1. In addition to the categories of Personal Information described above, we may also process further anonymized information and data that is not processed by reference to a specific individual. We may collect this Non-PII through the Website in the following ways:

- 3.1.1. Information that your browser sends (“**Log Data**”). This Log Data may include, (however is not limited to): non-identifying information regarding your device, operating system, internet browser type, screen resolution, language and keyboard settings, internet service provider, the web page you were visiting and information you search, etc.
- 3.1.2. We may use automated devices and applications to evaluate usage of our Website. We use these tools to help us improve our Website, performance and user experience. For more information on our cookies and other means of tracking, please see Section 6.1 “*Cookies*” below.
- 3.1.3. We may also engage third parties to track and analyze data or provide other services on our behalf. For more information, please see Section 7 “*Transfer to Third Parties*” below.

### 4. **The Purposes for which We Collect and Use Information**

- 4.1. Your PII shall be used by MedCu for the following purposes:
  - 4.1.1. to provide and operate the Website;
  - 4.1.2. to monitor and analyze use of the Website and study and analyze the functionality of the Website;
  - 4.1.3. to provide on-going customer assistance, technical support and maintain the Website;
  - 4.1.4. to provide service announcements, notices about employment opportunities, promotional messages and to market the our services;
  - 4.1.5. to enforce our Terms of Use, policies and other contractual arrangements and prevent misuse of the Website; and to comply with court orders and warrants and to take any action in any legal dispute and proceeding;
  - 4.1.6. to better understand your needs, both on an aggregated and individualized basis, in order to further develop, customize and improve our Website based on Visitors’ preferences, experiences and difficulties;
  - 4.1.7. to communicate with you and contact you to obtain feedback from you regarding the Website;



- 4.1.8. to disclose to third party vendors, service providers, contractors or agents who perform functions on our behalf with respect to the Website;
  - 4.1.9. to create aggregated statistical data and other aggregated and/or inferred Non-PII, which we or our business partners may use to provide and improve our Website; and
  - 4.1.10. as otherwise authorized by you.
- 4.2. We may use your email address which you provided us to contact you when necessary, including in order to send you reminders, offers and to provide you information and notices about the Website. At any time, you may choose (opt out) whether your Personal Information is to be used for sending such marketing materials which are not an essential part of the usage of the Website. You may exercise your choice by contacting us at: [DannyL@MedCu.com](mailto:DannyL@MedCu.com).
- 4.3. Your Non-PII shall be used by MedCu for the same purposes we use Personal Information (where applicable) and in addition for the following purposes:
- 4.3.1. To monitor and analyze your use of the Website for the technical administration and troubleshooting of the Website;
  - 4.3.2. For commercial research and further development;
  - 4.3.3. Improving the Website by creating system analytics and statistical data;
  - 4.3.4. Transfer to third party vendors, service providers, contractors who are working on our behalf for storage, process and/or back up purposes;
  - 4.3.5. Compile and aggregate statistical trends; and
  - 4.3.6. For any other legitimate purpose.
- 4.4. You hereby warrant and represent that you will not have claim and/or demand, of any kind, regarding the use of the Non-PII for any legitimate purpose.

## 5. **The Legal Basis for Use of Personal Information**

- 5.1. We will only process your Personal Information where we have a legal basis to do so. The legal basis will depend on the reason or reasons we collected and need to use your Personal Information. In almost all cases the legal basis will be:
- 5.1.1. To provide the content of the Website to Visitors.
  - 5.1.2. To fulfill a legitimate interest that we have as a business.
  - 5.1.3. Because you consented to us using the Personal Information for a particular purpose.
- 5.2. More information on the basis of processing:
- 5.2.1. Processing the Personal Information is required for taking steps at your request before entering into an agreement.
  - 5.2.2. Processing the Personal Information is required for fulfilling our or a third party's legitimate interests, for example: (1) we collect information about use of our Website in order to identify and prevent its abuse; (2) we use



Personal Information to maintain and improve our Website by identifying Visitor trends and technical issues.

5.2.3. You consent to the processing of Personal Information for one or more specific purposes, for example, to the extent that you consent, we will send you targeted information about our services.

5.3. It is hereby clarified that the legal bases detailed above are the legal bases for processing Personal Information carried out by us in accordance with the GDPR. If processing of Personal Information is subject to other Applicable Laws, then the legal basis for processing Personal Information may differ according to those Applicable Laws.

## 6. Technological Tools for Collection of Information

### 6.1. Cookies.

6.1.1. A cookie is a small data file that we transfer to your computer's hard disk for record-keeping purposes. When you access or use our Website, MedCu may use industry-standard technologies such as "cookies", other tracking technologies and other local files, which store certain information on the browser or hard drive of your computer and/or your mobile telephone device ("**Local Storage**") and which will allow us to distinguish you from other users, enable automatic activation of certain features, improve Your user experience and other capabilities and prevent fraudulent or abusive use of the Website.

6.1.2. Most devices and browsers will allow you to erase cookies from your device's hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. However, if you choose to block cookies on our Website, you may not be able to use part of the functions of the Website.

6.2. We may use analytics tools to help us understand Visitors' behavior on our Website, including by tracking page content, and click/touch, movements, scrolls and keystroke activities. The privacy practices of these tools are subject to their own policies and they may use their own cookies to provide their services. Further information about your option to opt-out of these analytics tools is available at: [DannyL@MedCu.com](mailto:DannyL@MedCu.com).

6.3. Depending on your computer settings, you may be allowed to refuse the use of such tools (whether in whole or in part). However, this may affect your ability to use the Website, including to access and use certain features.

## 7. Transfer to Third Parties

7.1. We do not sell, rent or lease your Personal Information. You hereby acknowledge and provide your informed consent, that in connection with the purposes set forth in this Privacy Policy, MedCu may share and/or otherwise transfer the Information to other third parties, as follows:

7.1.1. Third party service providers which assist us in the operation of the Website, including (without limitations) for storage or hosting of the Information and/or for the purposes set forth in this Privacy Policy;



- 7.1.2. In order to comply with any applicable law or legal requests, court orders and warrants including from law enforcement agencies, or when we believe in good faith that disclosure of Information is necessary to prevent imminent physical harm, financial loss or to report suspected illegal activity. In all cases, such Information will only be disclosed in accordance with applicable laws;
  - 7.1.3. To take any action in any case of dispute involving you with respect to your usage of our Website;
  - 7.1.4. To our affiliate; and
  - 7.1.5. In connection with a merger, acquisition, reorganization or sale of our assets or in the event of bankruptcy.
- 7.2. We may need to disclose Personal Information in response to lawful requests by public authorities or law enforcement officials, including meeting national security or law enforcement requirements. We cooperate with government and law enforcement officials to enforce and comply with the law.

## **8. Transfer of Data Outside Your Territory**

- 8.1. We may store, process or maintain information in various sites worldwide, including through cloud based service providers worldwide. If you are a Data Subject in the EU, and we envisage transferring your Personal Information to another country outside the EEA or to an International Organization, we will ensure that it is protected and transferred in a manner consistent with Applicable Laws. Personal Information may be transferred outside of the EEA or to an International Organization, in one of the following ways:
- 8.1.1. The country that we send the data to might be approved by the European Commission as offering an adequate level of protection for Personal Information (Israel is an approved country);
  - 8.1.2. The recipient might have signed “model contractual clauses” approved by the European Commission, obligating it to protect your Personal Information;
  - 8.1.3. Where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme; or
  - 8.1.4. In other circumstances the Applicable Law may permit us to otherwise transfer your Personal Information outside the EEA.
- 8.2. You can obtain more details of the protection given to your Personal Information when it is transferred outside the EEA (including a copy of the data processing agreement which we have entered into with recipients of your Personal Information) by contacting us as at [DannyL@MedCu.com](mailto:DannyL@MedCu.com).
- 8.3. If you are located in a jurisdiction where transfer of your Personal Information to another jurisdiction requires your consent, then you provide us your express and unambiguous consent to such transfer or the storage, processing or maintenance of the information in other jurisdictions by using the Website.

## 9. Rights regarding Personal Information

- 9.1. You have the right to review your PII that is stored in our database(s) and may have a right, under Applicable Law, to provide a request for update, amendment and/or deletion or exercise other rights under Applicable Law, by contacting us at: [DannyL@MedCu.com](mailto:DannyL@MedCu.com). We will act in accordance with the applicable law, in order to comply with your request.
- 9.2. We may retain certain information as deemed required by us in accordance with Applicable Laws, or for legitimate business reasons, for the duration as required under the Applicable Laws. In addition, we may delete any Personal Information pursuant to our policies, as in effect from time to time.
- 9.3. When you ask us to exercise any of your rights under this Policy and the Applicable Laws, we may need to ask you to provide us certain credentials to make sure that you are who you claim you are, to avoid disclosure to you of Personal Information related to others and to ask You questions to better understand the nature and scope of data that you request to access.
- 9.4. We may redact from the data which we will make available to you, any Personal Information related to others.

## 10. Security

- 10.1. We take the safeguarding of the Information very seriously, and use a variety of methods to try to protect the Information from loss or unauthorized use or access when it is in our possession or control, including reasonable technical and organizational measures that restrict access to the Information. However, we do not promise or guarantee that any Information will be fully protected from unauthorized disclosure or use.
- 10.2. We also regularly monitor our systems for possible vulnerabilities and attacks, and regularly seek new ways and for further enhancing the security of our Website and protection of our Visitors' privacy.
- 10.3. You should take steps to protect against unauthorized access to your passwords, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. In addition, you should take steps to protect against unauthorized access to Personal Information stored on your premises as well as defining limited access rights to such information on a need to know basis

## 11. Data Retention

- 11.1. We retain different types of information for different periods, depending on the purposes for processing the data, our legitimate business purposes as well as pursuant to legal requirements under the applicable law.
- 11.2. We may retain Personal Information for as long as necessary to support the collection and the use purposes under this Policy and for other legitimate business purposes, for example, for storing data, for documentation, for cyber-security



management purposes, legal proceedings and tax issues. We may store aggregated Non-PII without time limit.

11.3. In any case, as long as you use the Website, we will keep information about you, unless we are legally required to delete it, or if you exercise your rights to delete the information.

12. **Links to Third Party Sites.** The Website may enable interaction with or contain links to other third party websites or applications, for which privacy practices we are not responsible. Please read the terms and conditions and privacy policy of each such third party that you choose to use or interact with.
13. **Children.** The Website is not intended for minors under the age of 18 years and we do not intend to collect Personal Information from anyone we know to be under 18 years. If we learn that we have collected Personal Information from a child under 18 years, we will delete that information as quickly as possible.
14. **Changes to the Privacy Policy.** We reserve the right to change this Privacy Policy at our sole discretion. We will inform you of any such change by posting a new Privacy Policy on the Website; the effective date of any change of Privacy Policy will be clearly marked on each new Privacy Policy posted.
15. **Governing Law.** This Privacy Policy shall be governed by and construed in accordance with the laws of the State of Israel, excluding its choice of law principals. Disputes arising in connection with this Privacy Policy shall be subject to the exclusive jurisdiction of the competent courts in Tel-Aviv-Jaffa, Israel.
16. **Contact Us.** If you have any concerns or questions about this Privacy Policy, please contact us at: [DannyL@MedCu.com](mailto:DannyL@MedCu.com).

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