

PRIVACY RIGHTS POLICY

(Last Amended: January 2021)

Subject to applicable law requirements, Radix Technologies Ltd. ("**Company**," "**our**" "**we**" or "**us**") will provide individuals with the opportunity to exercise their rights regarding their Personal Information (as such term is defined in our Privacy Policy).

We value the privacy rights of our Customers and Visitors (as such terms are defined in the Privacy Policy, who shall also be referred to herein as "**you**" or "**yours**"). We have therefore, designed this Privacy Rights Policy ("**Privacy Rights Policy**" or "**Policy**") as an overview of your rights and choices regarding your Personal Information under applicable data protection regulations (such as the EU General Data Protection Regulation ("**GDPR**") or the California Consumer Privacy Act of 2018 ("**CCPA**" or "**Act**").

ACCESS TO SPECIFIC INFORMATION AND DATA PORTABILITY RIGHTS

You have a right to request us to confirm whether we process certain Personal Information related to you, as well as a right to obtain a copy of such Personal Information, with additional information regarding how and why we use this Personal Information. The GDPR and CCPA provide different protections with respect to this right. The GDPR enables access to all Personal Information processed by the controller however, the CCPA's "Access Right" applies **only** to Personal Information collected in the 12 months prior to the request. After we receive your request, we will analyze and determine the veracity and appropriateness of the access request and provide you with the applicable confirmation of processing, the copy of the Personal Information or a description of the Personal Information and categories of data processed, the purpose for which such data is being held and processed, and details about the source of the Personal Information that was not provided by you. Our response, as explained above, will be provided within the period required by law (please see additional information under "**Response Timing and Format**" below).

DELETION REQUEST RIGHTS

The Company is legally obligated to comply with a request to delete Personal Information if:

- the data is no longer needed for the original purpose and no new lawful purpose exists for its continued processing;
- the lawful basis for processing is consent of the data subject and such consent was withdrawn;
- the data subject wishes to exercise his or her right to object to the Company's processing of his or her Personal Information, and the Company has no overriding grounds for processing the data;
- the Personal Information is processed unlawfully; or
- erasure of the Personal Information is necessary to comply with applicable laws.

Additionally, if the Company has transferred Personal Information to a third party, a data subject also has a right to oblige the Company to notify those third parties that the information should be erased.

The right to erasure is not absolute. Even if a data subject falls into one of the categories described above, the Company is entitled to reject the data subject's request and continue processing the relevant Personal Information, subject to applicable law, if such processing is:

- necessary to comply with legal obligations;

- necessary to establish, exercise or defend legal claims; or is necessary for scientific research, etc.;
- necessary to perform a contract between you and us;
- necessary to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity;
- necessary to debug to identify and repair errors that impair existing intended functionality;
- to enable solely internal uses that are reasonably aligned with your expectations based on our relationship with you.

RIGHT TO OBJECT

Under the lawful basis of our **legitimate interests** and with regards to Personal Information processed by us (such as direct marketing), you may object to our processing on such grounds. However, even if we receive your objection, we will be permitted to continue processing the Personal Information in the event that (subject to applicable laws and regulations):

- our legitimate interests for processing override your rights, interests and freedoms;
- the processing of such Personal Information is necessary to establish, exercise or defend a legal claim or right, etc.

YOUR RIGHT TO BE INFORMED

You have the right to be informed with respect to the Company's details (e.g. name, address, etc.), as well as why and how we process Personal Information. This right includes, among others, the right to be informed of the identity of the business, the reasons and lawful basis for processing Personal Information, and additional information necessary to ensure the fair and transparent processing of Personal Information. Furthermore, you have the right to be informed with respect to the different categories of Personal Information collected, sold, disclosed by us in the previous 12 months. As such, we will ensure that our CCPA Privacy Notice discloses all of the above and is updated every 12 months. Please see our [CCPA Privacy Notice](#) for more information.

THE RIGHT OF RECTIFICATION

The Company must ensure that all Personal Information that it holds and uses about a data subject is correct. If such Personal Information is not accurate, a data subject has the right to require the Company to update such Personal Information so that it is accurate. In addition, if the Company has passed on incorrect information about a data subject to a third party, the data subject also has a right to oblige the Company to inform those third parties that this information should be updated.

THE RIGHT OF RESTRICTION

A data subject may limit the purposes for which the Company may process its Personal Information. The Company's processing activities may be restricted if: the accuracy of the Personal Information is contested; the processing of the Personal Information is unlawful and the data subject requests restriction instead of erasure; the Company no longer needs the Personal Information for the original purpose that it was processed for (this is subject to certain exceptions); or in consideration of overriding grounds in the context of an erasure request.

DATA PORTABILITY

You may request us to send or "port" your Personal Information held by us to a third-party entity, however it is important to note, that the GDPR and CCPA apply differently to this right, thus, we will handle this according to the jurisdiction you are subject to.

NONDISCRIMINATION

Under the CCPA, you must not be discriminated against for exercising any of your rights, including by being denied goods or services, charging you with different fees for goods or services, including through the use of discounts or other benefits or imposing penalties or it being suggested to you that you will receive a different price or rate for goods or services.

Notwithstanding the above it is permissible to set up schemes for providing financial incentives and you can opt-in to become part of them.

RESPONSE TIMING AND FORMAT

We aim to respond to a verifiable consumer request without undue delay and in any event, according to the applicable period of time under applicable laws. If we require more time, we will inform you of the reasons why we require more time and the extent of the extension period in writing. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information in that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

Furthermore, please note that, as explained above, under the CCPA your rights only apply to the Personal Information collected 12 months prior to the request and you are not entitled to submit more than 2 requests in a 12 month period.

This Policy applies solely to your rights concerning Personal Information processed by us.

PLEASE SUBMIT A REQUEST BY:

- * Filling in the Data Subject Request [form](#)
- * Emailing us at: privacy@radix-int.com