

## OP Innovate Website Privacy Notice

Last Revised: (2024.03.14)

### Introduction

This Privacy Notice details how OP Innovate Ltd. ("**us**", "**we**" or "**Company**") process information of users of our website and app (each, "**you**" or "**User**") collected through our website at op-c.net (the "**Website**").

We may revise this notice from time to time, in our sole discretion, and the most current version will always be posted on our website (as reflected in the "Last Revised" heading). We encourage you to visit this page regularly for any changes.

### What information we collect

We may collect personal information about you as follows ("**Personal Information**"):

- **Voluntary Information:** We may collect information that you provide us voluntarily such as your email address. For instance, when you sign up to receive updates or further information from us, or when you communicate with us via the 'start a free trial' option on the Website. In those cases we will collect your name, email address, role and the name of your organization, and retain them in our CRM systems.
- **Device Information:** We may collect specific types of connection details and information with regard to your device, software or hardware that may identify you. Such information may include your browser type, as well as an IP address.
- **User Activity.** Information regarding User's activity on the Website such as your clicks, actions and browsing on the Website, including recording the session.

### Cookies and Related Technologies

Cookies are small data files that are placed on users' devices to monitor how users interact with websites and other online services. Cookies can be used to identify your IP address, browser type, domain name, and specific web pages through which you click.

We and our service providers may use cookies because they:

- help us optimize, personalize and/or otherwise improve your experience and/or the performance of the Service and our service and marketing-related communications with you; and
- enable advertising delivered to you to be more relevant.

Most web browsers allow you to erase cookies on your computer, block cookies from your computer, or notify you when a cookie is stored on your computer. If you choose to disable or otherwise block certain cookies, you may be unable to use, or experience decreased functionality with, parts of the Service.

### **How we use the information**

We use the information in the manners described in this Privacy Policy. In addition to the purposes listed herein, the information we collect, which may include your Personal Information, is used for the following purposes:

- To respond to inquiries and requests from our Users, to improve our Website and to provide you with further information about our products and services;
- To detect and prevent fraudulent and illegal activity or any other type of activity that may jeopardize or negatively affect the integrity of the Website; and
- To investigate violations and enforce our policies, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process or respond to a government request.
- If the User consented to such use, we may use information provided voluntarily to contact you with promotional material and updates on our product offerings.

### **With whom we share the information and for what purpose**

We do not rent or sell any Personal Information. We may share Personal Information with the following recipients:

- our third party vendors engaged in providing services in connection with the Website;
- our subsidiaries and affiliated companies;
- auditors or advisers of our business processes; and
- any potential purchasers or investors in the Company.

We may share Personal Information with our recipients for any of the following purposes: (i) storing or processing Personal Information on our behalf (; (ii) assisting us with our business operations; and (iii) performing research, technical diagnostics, personalization and analytics that will enable us to improve the Website.

We may also disclose Personal Information, or any information you submitted via the Website if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our policies (including our agreements), including investigations of potential violations thereof; (iii) investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues; (iv) establish or exercise our rights to defend against legal claims; (v) prevent harm to the rights, property or safety of us, our affiliates, our users, yourself or any third-party; (vi) for the purpose of collaborating with law enforcement agencies; and (vii) in case we find it necessary in order to enforce intellectual property or other legal rights.

### **For how long we retain the information**

We retain the information that we collect from our Users for as long as we are providing the Website to the applicable customer. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under applicable regulations, we may keep records containing Users' Personal Information, account opening documents, communications and anything else as required by applicable laws and regulations.

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

### **Your privacy rights**

Certain jurisdictions provide Users with certain statutory rights to their Personal Information. Subject to exemptions provided by law, and with proper identification, you may have the right to certain actions to your Personal Information such as:

- Right to verify your Personal Information (to access, delete, change or update any Personal Information relating to you. For example, if you believe that your Personal Information is incorrect, you may ask to have it corrected or deleted);
- Right to see what Personal Information about you we have;
- Right to request that we erase Personal Information about you (subject to any other legal obligation that may require us to keep that information);
- Right to restrict us from processing Personal Information pertaining to you (for example, you may request that we will stop using or sharing your Personal Information with third-parties); and
- Right to export Personal Information in a portable format.

If you wish to exercise any of these rights, contact us at: [privacy@op-c.net](mailto:privacy@op-c.net). When handling your request, we will ask for additional information to confirm your identity (which may include Personal Information). However, please note that if you choose not to allow us to process your Personal Information, we may be prevented from providing our Website.

Please note that these rights are not absolute and may be subject to our own legitimate interests and regulatory requirements.

If you wish to raise a complaint on how we have handled your Personal Information, please contact us directly at: [privacy@op-c.net](mailto:privacy@op-c.net)

If you are not satisfied with our response or believe we are collecting or processing your Personal Information not in accordance with the laws, you can file a complaint to the applicable data protection authority.