PRIVACY POLICY

(Last updated: 9/19/2024)

Introduction

At APPUSH, we are committed to safeguarding the privacy and personal data of our users.

As an Israel-based company operating within the European Union, we comply with the

General Data Protection Regulation (GDPR) (EU) 2016/679, as well as the Israeli

Protection of Privacy Law, 5741-1981 (PPL) and other relevant regulations. These

frameworks ensure that the processing of personal data is lawful, fair, and transparent.

This Privacy Policy outlines how we collect, use, and protect your personal data, and it

details your rights under both EU and Israeli data protection laws. Our practices are

designed to respect your privacy while maintaining compliance with the GDPR for users

within the European Economic Area (EEA).

We have implemented robust technical and organizational safeguards to secure personal

information and protect against unauthorized access. This policy applies to all individuals

who interact with our services, including those visiting our website or engaging with our

digital advertising operations within and beyond the EEA.

For questions or concerns about this Privacy Policy or to exercise your data protection

rights, please reach out to us using the contact details provided in the "Contact Us" section

below.

### 1. Who is responsible for processing your data?

Your personal data will be handled by APPUSH LTD ("APPUSH"), whose details are:

- Address: AHAD HA'AM 48, TEL-AVIV, ISRAEL
- Data Protection Officer (DPO): dpo@appush.com

For privacy-related inquiries, contact us via the above email addresses or by mail at the provided address.

#### 2. Definitions

- **Personal information**: Any data identifying or relating to an individual, such as name, email, phone number, or IP address.
- Processing: Any action performed on personal information, including collection, storage, usage, disclosure, or deletion.

### 3. Information we collect

We may collect your personal information when you use our website (<u>www.APPUSH.com</u>) or interact with our advertising services. The data may include:

- Contact Information: Name, email, phone number.
- **Technical Information**: IP address, browser type/version, operating system, device details.
- **Usage Information**: Pages visited, time spent, referral source, interactions.
- Advertising Information: Ads shown, delivery time/location, device type.
- Third-Party Data: Information from partners (advertisers, publishers) that have lawful grounds to share your data.

### 4. Purposes of processing

Your personal data may be processed for:

- Providing and improving our website and advertising services.
- Personalizing ads based on your preferences.
- Measuring the effectiveness of ads.
- Complying with legal or regulatory obligations.

Your data will only be used for the purposes it was collected or a compatible one.

### 5. Lawful basis of processing

We will only process your data if legally permitted under the GDPR:

- **Consent**: You have explicitly agreed to the processing for a specific purpose.
- Contract Execution: Processing is required to fulfill or prepare a contract with you.
- **Legitimate Interest**: Processing is necessary for our or third-party interests, provided they don't override your rights.
- **Legal Obligation**: Processing is necessary to comply with legal requirements.

# 6. Disclosure of personal information

We may share your data with:

- Advertising partners and publishers: To deliver relevant, tailored ads.
- Service providers: For website hosting, analytics, and customer support.
- Authorities: When legally required to do so.
- International transfers: If data is shared outside the **EEA**, safeguards will be implemented (e.g., contractual clauses).

# 7. Retention of personal information

We retain your data only as long as necessary:

- Contact information: Maintained as long as our relationship continues.
- Technical/Usage/Advertising information: Retained to improve services and meet legal obligations.

After expiration, data will be securely deleted or anonymized.

### 8. Legal Age

While browsing our website doesn't require legal age, using our services requires you to be of legal age and legally capable.

### 9. Your Rights

In accordance with **Organic Law 3/2018** and the **GDPR**, you can exercise the following rights:

- Access: Request a copy of your data.
- Rectification: Request correction of inaccurate data.
- **Erasure**: Request deletion of data under certain conditions (e.g., withdrawn consent).
- Restriction: Limit processing if you contest data accuracy or object to processing.
- Data Portability: Receive your data in a structured format for transfer to another service.
- **Objection**: Object to processing for direct marketing or other specific purposes.

Automated decisions related to targeted ads are conducted following industry standards (IAB Framework). You may request human intervention, express your views, or contest such decisions at any time.

### 10. Security Measures

We employ high-security standards, following **Organic Law 3/2018** and the **GDPR**, to protect your data from unauthorized access, loss, or damage. While we strive for the best, no electronic storage or transmission method is 100% secure. For inquiries regarding our security practices, contact <a href="mailto:dpo@appush.com">dpo@appush.com</a>.

### 11. Social Networks

We maintain a corporate profile on **LinkedIn**. If you engage with us (e.g., by following or liking our profile), you accept this Privacy Policy. We share relevant content via these networks, but note that APPUSH is not responsible for their independent data practices.

### 12. Cookies and Similar Technologies

We use cookies to improve your experience on our website. For more details, see our **Cookie Policy**.

#### 13. Contact Us

If you have questions about this policy or wish to exercise your rights, contact:

APPUSH LTD

AHAD HA'AM 48, TEL-AVIV, ISRAEL

dpo@appush.com

We will respond within one month. If more time is needed, we will inform you of the reason and your right to lodge a complaint with a supervisory authority.

### 14. Changes to this Privacy Policy

We may update this policy periodically. Significant changes will be communicated, and consent will be requested if necessary.

### 15. IAB Europe Transparency & Consent Framework (TCF) Compliance

We comply with IAB Europe's **TCF Policies** to ensure:

- · Transparent and lawful data processing.
- Proper user consent management.
- Secure data storage.

Our IAB Europe ID is **879**, indicating our compliance and integration within the TCF framework.

# 16. APPUSH's Legitimate Interest

We process certain data under legitimate interest, such as managing privacy preferences.

A **Legitimate Interest Assessment (LIA)** ensures a fair balance between our interests and your rights, confirming that this processing is necessary and compliant with regulations.