

LIGHTRICKS PRIVACY POLICY

Last Modified: January 29, 2025

Lightricks Ltd., including our subsidiaries and affiliated companies (collectively, “Lightricks”, “we”, “our” or “us”), puts great efforts in making sure that the Personal Data (as defined herein) we process is stored securely and used properly, and that our data processing practices are accurately communicated to our users and prospective users.

This privacy policy (“Policy” or “Privacy Policy”) describes how we collect, store, use and disclose Personal Data while using any of our mobile apps and web services (each an “App”), features and feeds (“Lightricks Feed”), our online marketplace (“Popular Pays Marketplace”) connecting brands and agencies (“Brand(s)”) and individuals, content creators and influencers (“Creator(s)”) and tools and services to be used for Brands in connection with their digital campaigns’ operation (“Campaign Tools”) (collectively “Services”), all of which process your Personal Data differently. We encourage you to read this Policy carefully and reach out to us if you have any further questions.

This Policy is applicable to (collectively and separately, referred to as “you” or “your”): (i) prospects and visitors browsing our websites, landing pages, engaging with ads and campaigns promoting our services, blogs or other web-forms and digital assets (“Prospect” and “Visitor”, respectively); (ii) users accessing, installing or otherwise using our Apps (“Users”); (iii) Brands and Creators using the Popular Pays Marketplace or Campaign Tools; and (iv) any individuals using our Services.

Any Personal Data you provide is made at your free will and consent (where required under applicable data protection laws), and you acknowledge that you are not under any statutory obligation to provide us with Personal Data. However, we must collect or receive some Personal Data to provide the Service, and if you will not provide us with such Personal Data, we will not be able to fulfill certain purposes, for example, provide certain Services or enable use of certain features – all as described under **Section 4** below - “*Personal Data Sets We Process & Purpose of Collection and Use*” which details the purposes for which each Personal Data set is collected.

This Privacy Policy further includes or incorporates specific information required under applicable data protection laws for residents of certain jurisdictions, among others:

If you are located in the EEA or UK – this Privacy Policy further details our lawful basis for processing Personal Data, information regarding cross border data transfer and your rights, your rights related to your Personal Data we process, as well as additional information we are required to disclose to you under the EU and the UK General Data Protection Regulations (collectively “GDPR”).

If you are a California resident – please also review our [CCPA Privacy Notice](#) which serves as a *Notice at Collection and Privacy Policy* as required under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (“CCPA”) and further details the categories of information collected and additional information regarding our privacy practices, including your rights under the CCPA and other California privacy laws.

Additional information to certain United States residents – please also review Section 13(ii) of this Privacy Policy “[Additional Notice to US Residents](#)” to learn more about our privacy practices and your rights under these territories.

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1. UPDATES AND AMENDMENTS

We may update and amend this Policy from time to time, at our sole discretion. The most recent version of the Policy will always be accessible from our website and Apps. The updated date of the Policy will be reflected in the “Last Modified” heading. In case of a material change, or if required by law, we will provide notice reflecting these changes and any such material amendments to our privacy practices described under this Policy will become effective within the period noted in such notice. Unless otherwise notified, any changes will become effective when we publish the modified Policy. We recommend you review this Policy periodically to ensure that you understand our most updated privacy practices.

2. DATA CONTROLLER & CONTACT INFORMATION

Lightricks Ltd. is incorporated under the laws of the state of Israel and, unless otherwise explicitly mentioned in the table below, is the “**data controller**” (as such term, or equivalent, is defined under applicable data protection legislation) of the Personal Data collected through the Services. Meaning, we control the processing of Personal Data described under this Privacy Policy and decide upon the purpose and means of collection and processing.

For any questions, inquiries or concerns related to this Privacy Policy or the processing of your Personal Data, you may contact us as follows:

Data Protection Officer – Contact Information:

By Email: dpo@lightricks.com

By Mail:

Lightricks Ltd.

Professor Racah St, Building 5.4, Jerusalem, Israel, 9190401

Attn: Data Protection Officer

Data Protection Representative - For Data Subjects in the EU and UK - Contact Information:

We have appointed Data Protection Representatives (“DPR”) in Germany and in the UK for data protection matters concerning EU or UK data subjects.

● **EU DPR Contact Information:**

Inquiries regarding our EU privacy practices may be sent to our EU DPR as follow:

By Email: dpr@lightricks.com

By Mail:

Lightricks GmbH,

c/o Mazars Tax GmbH, Theodor Stern Kai 1, 60596 Frankfurt am Main, Germany.

Attn: EU Data Protection Representative

● **UK DPR Contact Information:**

Inquiries regarding our UK privacy practices may be sent to our UK DPR as follow:

By Email: uk-dpr@lightricks.com

By Mail:

Lightricks (UK) Ltd (ICO Registration number: ZB253341),

37 Broadhurst Gardens, London, England, NW6 3QT United Kingdom.

Attn: UK Data Protection Representative

3. TYPE OF DATA SETS PROCESSED

During your use or interaction with the Services, we collect information which does not identify a specific natural person and cannot reasonably be used for such identification (“**Non-Personal Data**”). Non-Personal Data collected may include technical information regarding your device or browser, type of operating system, scope, frequency, interactions with the website, and other technical information regarding the device used – all is considered as Non-Personal Data when collected on an aggregate basis, or otherwise not combined with any identifiers. We may further process and anonymize Personal Data in a manner that the data will be Non-Personal Data. Non-Personal Data may be used by us without limitation and for any purpose. Some of this information may be considered “de-identified” under applicable laws and when we rely on data that has been “de-identified”, we will take reasonable measures

to ensure that the de-identified information cannot be associated with an individual, household, or device and not attempt to re-identify it.

We further collect information that identifies an individual or may, with reasonable effort, be used to identify an individual (“**Personal Data**”). The types of Personal Data that we collect as well as the purpose for processing such data are specified in the tables below. For the avoidance of doubt, any Non-Personal Data connected or linked to any Personal Data shall be deemed Personal Data as long as such connection or linkage exists.

4. PERSONAL DATA SETS WE PROCESS & PURPOSE OF COLLECTION AND USE

We have detailed below, for each type of Service, the Personal Data processed, the purpose and operation and the lawful basis for such processing (subject to the GDPR, if applicable).

To make it easier for you to reach the processing operation applicable to your interactions with us, we have classified our disclosure based on the type of our Services. There are four tables below:

Table A details the **Personal Data processed while using our Apps**, such as when you create an account, use our editing tools or AI tools, including through our website or tools and features accessible through third party platforms, by using our bots, tags, etc. (“**Third Party Platforms**”);

Table B details the Personal Data used for **AI training, machine learning**, or otherwise used for internal development and Service enhancement purposes;

Table C details the Personal Data processed when using **Popular Pays Marketplace or Campaign Tools**; and

Table D details the Personal Data processed when you interact with our **website(s), ads, or other digital assets**.

TABLE A: APPS, AI & EDITING TOOLS AND TECHNOLOGIES

PERSONAL DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS (UNDER THE GDPR)
<p><u>Registration, Account Data & Information:</u></p> <p>After you install the App or upon accessing web Apps, you will log in and create your account (for iOS users, creating an account is optional).</p> <p>You may choose to login using your Apple, Facebook or Google account or otherwise by entering your email address.</p> <p>If you login through Apple, Facebook, or Google, we will receive information connected to such account (depending on the privacy settings you chose) such</p>	<p>We use the Registration Data to create an account, and for authentication and identification purposes. If you use several Apps and you have signed in, we will be able to identify you across those various Apps and share the information processed in each of the Apps.</p> <p>We will use your email address to send you operational messages such as invoices and services related messages.</p> <p>We may further send you other materials and content, including</p>	<p>Registration Data and Account Data are processed for the purpose of performing our contract with you, meaning, to designate your account and provide with requested Services.</p> <p>Processing for Direct Marketing is subject to our legitimate interest, you may opt-out at any time by unsubscribing. Note, even if you unsubscribe operational and service-related messages will still be sent.</p>

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<p>as your name, profile picture, friends list, demographic data and location (collectively “Registration Data”).</p> <p>For certain Apps, you may further voluntarily choose to add or provide certain information about you under your account or bio page, such as certain preferences, characteristics, demographic data, etc. In addition, for certain Apps and Services, you may choose to upload photos to label and associate with each profile you create and wish to include under your account (i.e., a thumbnail image).</p> <p>(collectively “Account Data”)</p>	<p>marketing materials (“Direct Marketing”).</p> <p>Additional Personal Data you voluntarily provide as part of the Account Data will be used to provide the Services for which such information was provided, as well as for Services improvement, development, and customization, as further detailed under this Privacy Policy.</p>	
<p>Online Identifiers and Usage Data:</p> <p>When you use the Apps (including tools and features made available through our website or Third-Party Platforms), we, or our third-party partners, identify you through Online Identifiers. “Online Identifiers” are unique identifiers associated with your account, device or browser, which are either designated by us or transmitted from your device, and may include identifiers known as “IDFA” or “AAID”, IP address, cookie ID, agent, etc.</p> <p>We further process, directly or indirectly through our third-party partners and service providers, usage data, which may or may not be associated with the Online Identifiers or your account. When associated with an Online</p>	<p>Online Identifiers and Usage Data are used for analytics and operational purposes, correcting errors and bugs, to secure our Services and related systems, to enable you to use the Services and to provide you with its functionalities.</p> <p>Some of the Apps further display interest-based ads or other marketing and promotions which are based on the Usage Data.</p> <p>We may further use the Usage Data to customize our Services and offer you and our users’ content or other Services based on Usage Data or statistics and our analyze of Usage Data, meaning that we can assume you will be interested in based on other features you have used, etc.</p>	<p>When the processing of Online Identifiers and Usage Data is for marketing or tracking purposes, we will obtain your consent to process Personal Data (where required under applicable laws).</p> <p>When the processing of Personal Data is for operations and providing the Services’ functionalities, the lawful basis is contract necessity.</p> <p>Last, the Personal Data may be processed subject to our legitimate interest of ensuring the security of our Services, understanding how our Services are used, correcting errors and enhancing experience, including by personalizing our offers, content and promotions, as further detailed under Table B.</p>

PERSONAL DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS (UNDER THE GDPR)
<p>Identifier or your account it will be treated as Personal Data.</p> <p>The usage data includes information regarding your interaction with the App and Services, features used, time stamp and duration of use, click stream data, errors that occurred, as well as your interaction with the content or ads displayed, records of advertising and content displayed on pages or App screens displayed to you, and any interaction you may have had with such content or advertising (collectively “Usage Data”).</p>		
<p><u>Editing Tools – Images, Photos, Videos & Face Data:</u></p> <p>To enable the Services, you will either provide us access to your camera or photo gallery or import photos or videos from your gallery.</p> <p>If you use our editing tools, images, photos and videos are processed on your device for the purpose of determining the estimated location of parts of faces (such as the eyes, nose or mouth) and points on the face and eyes, which are applied to a generic model of a face that is used to help you edit images and videos in real time (“Face Data”). We do not collect or store Face Data on our servers or share it with third parties. Face Data is not used to identify you or anyone else. However, Face Data may be deemed to include “biometric identifiers” or “biometric information” according to the</p>	<p>We process the data to enable the use of the editing tools and features available within the Services (Apps and other editing tools), including the ability to edit your photos, images or videos, and to further improve the results of the created artwork.</p> <p>When photos, videos or images are used for creating artwork or adding effects to your creations, the selected content is uploaded to the Lightricks Cloud. The photos, videos and images you upload are stored for up to 30 days, except where you have: (i) provided us with consent to further retain the content you have uploaded for AI training and machine learning purposes (as detailed under Table B below), or (ii) uploaded such content through the use of our “LTX Studio” Services of film production, where in such event we need to retain such content for as long as your created</p>	<p>We process the images, video photos, Face Data, demographic data, and characteristics related data (inferred or provided by you as part of your Account Data), for the purpose of providing the Services and performing our contract with you.</p> <p>If you granted access to your photo gallery, you can revoke the permission at any time.</p> <p>We will further process demographic data or otherwise any characteristics related data (inferred or provided by you), as well as data related to the features or effects used, subject to our legitimate interest, to improve, enhance and customize our offers and Services, as further detailed under Table B.</p>

PERSONAL DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS (UNDER THE GDPR)
<p>laws of your jurisdiction and will only be processed with your consent if you use our Services in jurisdictions where such consent may be required, subject to the terms of such laws and this Policy.</p> <p>If you choose to store projects that use Face Data, the data will be stored on your device until you delete the project, the project is deleted automatically due to storage limits, or you delete the App.</p> <p>Depending on the App and Service you use, we also process demographic data, such as age (or age group) and gender and other characteristics such as skin tone, which are either inferred from your images, photos and videos or otherwise provided by you (as part of your Account Data), as well as additional information you voluntarily choose to provide us.</p>	<p>artwork is retained (i.e., the output, as further explained below), in order to maintain the sequence of images you chose to integrate and include in such output.</p> <p>Your output image or other created artwork will be stored on our Lightricks Cloud until you request us to delete your Personal Data and your account, in order to make such output image or other created artwork accessible to you, provided that we may earlier delete such outputs according to our internal retention policies.</p> <p>If you no longer want our Apps to process Face Data, you can disable access by our Apps to your camera and photo gallery and stop importing photos or videos from your gallery at any time, but if you do so, we will not be able to provide you with the applicable Services.</p> <p>We will further process demographic data, and other characteristics (inferred or provided by you as part of your Account Data), as well as the features or effects you use through our Services in order to: (i) market personalized offers by Lightricks, and for example, to offer you features which are similar to the features you use or popular among users with similar characteristics. We do not use Face Data for marketing purposes and this information is not shared with any third parties; and (ii) AI training,</p>	

PERSONAL DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS (UNDER THE GDPR)
	<p>machine learning, internal development and Service enhancement (as further described in Table B below).</p>	
<p><u>AI Tools and Features - Inputs, AI Tools Outputs, Face and Voice Recognition Models, Face and Voice Models (LTX Studio) & Chatbots:</u></p> <p>Certain Services accessible through the Apps, our website or Third-Party Platforms include artificial intelligence (“AI”) technology for creating and editing images, photos, videos, and audio recordings. This AI technology, which may further include face and voice recognition technology, allows you to use various features, including, among others, personalized magical avatars (“Avatars”), motions and effects, art styles, text to image, headshot editing, and synthetic voice speech, “swap” features or other face or voice manipulation features, film production (as part of our LTX Studio Services) (collectively “AI Tools Outputs”).</p> <p>To create the AI Tools Outputs, as well as to generate the Face and Voice Recognition Models, or Face and Voice Models for LTX Studio Services (both terms as defined below), and as applicable, we process, including by our AI technology, the original images, photos, videos, or audio recordings that you upload (“Inputs”), as well as demographic data (such as gender and skin</p>	<p>We process the data, including Inputs, Face and Voice Recognition Models, Face and Voice Models, metadata, and other information you voluntarily choose to provide, for the purpose of providing the Services and generating the AI Tools Outputs.</p> <p>Note that, this data might be processed on your device or otherwise uploaded and processed on the Lightricks Cloud – depending on the specific App, feature, or Service you use.</p> <p>Specifically, to create the Avatars, we process 10-25 images as Inputs, and we are currently using the neural network model Stable Diffusion that allows Users to generate personalized Avatars.</p> <p>Inputs are usually retained for a short-term period of up to 30 days after the AI Tools Outputs are generated, except where you have: (i) provided consent to use the Inputs to generate Face and Voice Recognition Models, where in such case we will retain the Inputs for as long as we retain the Face and Voice Recognition Models in order to provide these Service and enhance your AI Tools Output; (ii) provided us with consent to further retain the Inputs for</p>	<p>We process the Inputs, metadata, or other information you voluntarily choose to provide, to create the AI Tools Outputs and optimize their results, meaning, for the purpose of providing the Services and performing our contract with you.</p> <p>Face and Voice Recognition Models and Face and Voice Models are processed based on your consent. You have the right to withdraw your consent at any time, as set forth under Section 8 <i>Your Rights</i>, below, or through the App’s Privacy Settings.</p> <p>We will further process demographic information, the gathered metadata or otherwise any characteristics related data, as well as data related to the features or effects used, subject to our legitimate interest to improve, enhance and customize our offers and Services, and for example, to offer you features which are similar to the features you use or popular among users with similar characteristics, as further detailed under Table B.</p>

PERSONAL DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS (UNDER THE GDPR)
<p>tone) provided by you under your Account Data.</p> <p>To create the AI Tools Outputs, including to improve and optimize the results, our AI technology further generates and processes types of information known as “metadata”, meaning, information extracted from your Inputs and describing certain elements of such Inputs such as estimated demographic data (for example age or age group, gender and skin tone of the character or voice in the Input), and other labels or tags of items in such Inputs, as well as uses face detection to analyze Inputs (images and videos) in order to estimate the posture and location of faces or of parts and areas of faces and other non-identifying characteristics of faces that appear in frame.</p> <p>We may further process Non-User Personal Data (as defined and described in the section below), in the event your Inputs include any third party’s image or voice.</p> <p>- <u>Face and Voice Recognition Models:</u></p> <p>To provide certain features and AI Tools Outputs, as part of our AI technology, we further use face and voice recognition technology.</p> <p>If you have enabled this technology, it uses your Inputs (images, photos, videos, voice recordings, etc.), as well as the “metadata” described above, to extract facial features information (such as facial geometry, topology, and face embeddings),</p>	<p>development and AI training and machine learning purposes (as detailed under Table B below); or (iii) uploaded such Inputs through the use of our “LTX Studio” Services of film production, where in such event we need to retain such Inputs for as long as your AI Tools Outputs are retained (as further explained below), in order to maintain the sequence of Inputs you chose to integrate and include in such AI Tools Outputs.</p> <p>In the event that AI Tools Outputs are processed and stored on the Lightricks Cloud, such will be retained to remain accessible for you through the App at any time and from any device until you decide to delete them by requesting us to delete all your information and your account, provided that we may earlier delete such AI Tools Outputs according to our internal retention policies.</p> <p>In the event that the Face and Voice Recognition Models or Face and Voice Models created from your Inputs are processed and stored on the Lightricks Cloud or on your device, they will be stored to enable repeat experiences using them. Face and Voice Recognition Models and Face and Voice Models will be permanently deleted within 2 years after the last time you have used our Services unless we are legally required to maintain the data for a longer</p>	

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<p>or a voiceprint, and generates a model that can recognize your unique facial or vocal characteristics (“Face and Voice Recognition Models”).</p> <p>Face and Voice Recognition Models are used to recognize your face or voice in your Inputs and enable the creation of enhanced AI Tools Outputs.</p> <p>Face and Voice Recognition Models may be deemed “biometric identifiers” or “biometric information” according to the laws of your jurisdiction, and will only be processed with your consent, subject to the terms of such laws and this Policy.</p> <p>- <u>LTX Studio - Face and Voice Models:</u></p> <p>To provide certain visual and voice AI Tools Outputs as part of our LTX Studio Services, our AI technology uses your Inputs (images, photos, videos, audio recordings, etc.), as well as the “metadata” described above to generate facial features information (such as facial geometry, topology, and face embedding) or a voice print, in order to create a model of the face and a voice print that appears in your Input (“Face and Voice Model”). Face and Voice Models are not used to identify you or anyone else. However, Face and Voice Models may be deemed “biometric identifier” or “biometric information” according to the laws of your jurisdiction, and will only be processed with your consent,</p>	<p>period. We will further delete Face and Voice Recognition Models and Face and Voice Models if you withdraw consent, you ask us to delete all your information and your account or in accordance with our retention policies.</p> <p>Face and Voice Recognition Models and Face and Voice Models if retained and stored by us, are retained and used solely to provide you with the Services including additional AI Tools Outputs you request to generate through your use of the App and Services.</p> <p>We may further use Face and Voice Recognition Models and Face and Voice Models for AI training and machine learning purposes, in the event you have separately provided us with consent for such use (as detailed under Table B below) .</p> <p>You may withdraw your consent to our processing of Face and Voice Recognition Models and Face and Voice Models at any time as set forth under Section 8 – <i>Your Rights</i>, below, or through the App’s Privacy Settings.</p> <p>We do not share Face and Voice Recognition Models or Face and Voice Models with third parties except in the limited circumstances described under this Policy (see Section 7 – <i>Data Sharing</i>, below).</p>	

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<p>subject to the terms of such laws and this Policy.</p> <ul style="list-style-type: none"> - <u>Use of AI Tools through Third Party Platforms:</u> <p>Our AI technology may be further accessible through Third Party Platforms, which enable you to generate and receive the AI Tools Outputs within such Third-Party Platforms. Please note that, any information that you upload to, or obtain through, Third Party Platforms (even if using our pages and bots), shall be further subject to such Third-Party Platforms' terms and policies that apply to you as their user, and we do not have control nor responsibility in this regard.</p> <ul style="list-style-type: none"> - <u>AI Tools – Chatbots:</u> <p>Our Services may include interaction with chatbot, to be provided with AI Tools Output or feedback and recommendations regarding Inputs you upload (for example feedback related to certain characteristics of the images, etc.). These chatbots may be powered by third party service providers AI tools to process your Personal Data and provide the AI Tools Output (as further explained under our Terms of Use). The use of chatbot features will include processing of your Input, and the AI Tools Output which may include certain inferred demographic information or other characteristics such as gender, skin tone, hair, and eye colors, etc.</p>	<p>Inputs, the gathered metadata, and AI Tools Outputs, may be further used for AI training and machine learning purposes (as further described in Table B, below).</p> <p>We will further process the inferred demographic data, tags, labels or otherwise any characteristics related data, as well as data related to the features or effects used, to improve, enhance and customize our offers and Services.</p> <p>Note that, within the parameters set forth above, we may retain, store, or delete Inputs and AI Tools Outputs at our discretion and the above shall not be considered as any obligation on behalf of Lightricks to store or retain any information.</p>	
<p><u>Non-User Personal Data:</u></p>	<p>We process the Input you upload (as defined above) for</p>	<p>Non-User Personal Data is processed based on our</p>

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<p>You may only provide Inputs that include Personal Data of others (“Non-Users”) if you are authorized to consent and have consented (or otherwise acknowledge or approve, as required under applicable laws) to the terms of this Privacy Policy on their behalf.</p> <p>For certain Services, where we are able to determine that you have shared Non-User Personal Data with us, such as the images or videos that you submit in connection with our “couples’ avatars” feature, we will use the images or videos to generate the Avatar, or other Output and delete the Inputs permanently from the Lightricks Cloud.</p> <p>In addition, you may invite friends to use our Apps. By doing that you will be requested to share the contact details of your friend(s) (such as email address or phone number).</p>	<p>the purpose of providing the Services and the additional purposes described under this Privacy Policy.</p> <p>We will process your friend contact details only for the purpose of sending them an invite to use the Services, we will not use this data for any other purpose.</p>	<p>legitimate interest in providing the Services to our User.</p>
<p><u>Support:</u></p> <p>When you contact us for customer support, we will process your contact information, as well as any information you choose to provide as part as our communications and correspondence.</p>	<p>We will use the contact information to provide the customer support and communicate with you. We will retain such communications to have records of the support that was provided, for any future needs as well as to further improve our Services and support.</p>	<p>We process such information, for the purpose of providing the support services and performing our contract with you.</p> <p>We will further retain our communications for records keeping and services improvement, including to train our customer support team, based on our legitimate interest.</p>
<p><u>Survey and Feedback:</u></p> <p>We may ask you to provide feedback on our Services through various means of communications</p>	<p>We use this information to improve, revise and enhance our Service, as well as optimize and customize the Services.</p>	<p>We process such information subject to your consent. You may withdraw your consent at any time by contacting us</p>

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<p>such as through our App, Direct Marketing (as defined above), or otherwise through third party survey platforms. If you choose to address our request for such feedback or participate in our survey, we will collect your feedback (as provided, i.e., in writing or otherwise any call recording) and may collect, as applicable, additional information related to the feedback provided such as the Input, Output or feature of our App used which is the subject matter of the feedback, contact information such as your name, email address, etc.</p>		<p>through the contact information provided herein.</p>
<p><u>Purchase Details:</u></p> <p>Certain features and Services are subject to payment, either in-app or subscription payments. Payments are made through in app purchase (“IAP”), in which Google Play or Apple Store terms would govern such payments, or by third party payment processing services (such as Adyen and PayPal) and we do not collect store, or have access to your full payment details; however, we process the commercial transaction data such as, records of purchases and prices; shipping details (if applicable); address, contact telephone number, email address, IP addresses and your approximate location extracted from the IP address (e.g., country and Zip). (“Transactions Data”).</p>	<p>We use Transactions Data to process your payments and provide the applicable Service you have purchased.</p> <p>Any information related to your payment means and transactions is processed by the third parties' platforms or IAP and will be further governed by such third parties' own privacy policy and terms, which we recommend that you review.</p>	<p>We process Transactions Data to provide the Services and perform our contract with you.</p> <p>We may further use such information to analyze our Services and their performance (e.g., features' popularity), as well as to customize and improve our offers and Services, based on our legitimate interests.</p>
<p><u>Social Media:</u></p> <p>When you use the Lightricks Feed, or share your creations on social</p>	<p>We use the Feed Data to provide you with the Lightricks Feed Services and to enable your interaction with third party</p>	<p>We process Feed Data to enable and provide such</p>

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<p>media, we will process Personal Data which you make available, such as profile photos, name, email address, social media accounts, reactions to feed posts and your searches made withing the Lightricks Feed (“Feed Data”).</p>	<p>social media. We further process your searches for internal analytics and Service improvement purposes, as well as to customize our offers and content.</p>	<p>Service, for the performance of our contract with you.</p> <p>Feed Data is further processed for internal analytics and Service improvement purposes based on our legitimate interests.</p> <p>Note, information you choose to make public, may not be able to be deleted even if you delete the App and your account.</p>
<p>Permissions:</p> <p>Depending on the App used or the features you wish to enjoy, you will be asked to grant us access permissions such as: access to photo gallery, microphone or audio files, enable tracking tools, push notification, access to your social accounts, etc. (“App Permissions”).</p>	<p>We will use these permissions to process the information needed to provide the Service or enhance the Service.</p>	<p>To access these App Permissions, you will need to actively and explicitly enable them through an in-app permission or the device settings. You can disable the App Permissions at any time, however note, depending on the App Permission if you disable App Permission, certain feature or all features might not properly operate.</p>
<p>Use of Third-Party Technologies:</p> <p>Our Apps may include integration with third-party analytics service providers such as Google Analytics, Google’s Crashlytics and Firebase services, and Facebook. We may disclose your information (such as Online Identifiers and Usage Data) to these analytics providers to help us learn more about how you and others use our Services. For more information on the Software Development Kits (“SDKs”) integrated on our Apps, please see below:</p> <p>AppsFlyer SDK; Nimble SDK; AppLovin SDK; Facebook iOS SDK;</p>	<p>We will disclose the information to third party analytic providers for marketing and tracking purposes, analytics and operational purposes, correcting errors and bugs, enhance the Services such as to adjust language preference, if applicable, to enable you to use the App and to provide you with its functionalities.</p>	<p>When the processing is for marketing or tracking, where required under applicable laws we will process the Personal Data based on consent. Otherwise, we will process and share the Personal Data subject to our legitimate interest.</p>

PERSONAL DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS (UNDER THE GDPR)
Firebase iOS SDK ; Google signing iOS SDK ; Survey-Monkey iOS SDK ; TikTok SDK ; Braze SDK ; Full Story SDK ; Pendo.io SDK ; Snapchat SDK ; Optimizely SDK		

TABLE B: AI TRAINING, MACHINE LEARNING, INTERNAL DEVELOPMENT & SERVICE ENHANCEMENT

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS (UNDER THE GDPR)
<p>1) Usage Data;</p> <p>2) Inputs, including the posture, location and other non-identifying characteristics of faces detected in Inputs by our AI technology (but not including Face Data, defined above);</p> <p>3) Outputs (including AI Tools Outputs);</p> <p>4) Inferred demographic data and metadata such as estimated gender or age group and skin tone;</p> <p>5) Face and Voice Recognition Models but only if you have consented to processing these data types; and</p> <p>6) Face and Voice Models but only if you have consented to processing these data types.</p> <p>Note that, all capitalized terms listed herein are defined under Table A above.</p>	<p>We will use the Usage Data, inferred demographic data and metadata, labels, tags, and other metadata for statistical, analytic purposes and internal development including to enrich the content, create new features and improve the Services, the features available within the Services, and the way we offer them, as well as to personalize the Service offered to you, tailor offers to your interest and offering additional Lightricks’ products, apps or services which we believe you will enjoy, based on your use.</p> <p>Subject to your consent, we will use the data sets listed under this Table B for AI training and machine learning purposes (“AI Training Data”). AI Training Data will be used to train our AI algorithm and technology, develop and create models (such as diffusion models, GAN, and others) and features, as well as to improve our AI Tools and Service.</p> <p>In addition, we automatically label certain images detected in</p>	<p>The Usage Data, inferred demographic data and metadata, labels, tags, and other metadata as well as Inputs and Outputs used for internal development, Services improvement and personalization and are processed subject to our legitimate interest to improve our Services and technology.</p> <p>The AI Training Data will be processed for AI training and machine learning purposes, subject to obtaining your consent. You have the right to withdraw your consent at any time, as set forth under Section 8 <i>Your Rights</i>, below, or through the App’s Privacy Settings.</p> <p>AI Training Data will be permanently deleted within 2 years after we process them for training purposes, unless we are legally required to maintain the data for a longer period. We will also delete AI Training Data if you withdraw consent for Lightricks to use your personal data to improve</p>

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS (UNDER THE GDPR)
	<p>your Input such as “dog”, “cat”, and male, female, estimated age group and skin tone to improve the performance of the AI technology and features and the AI Outputs (including AI Tools Outputs), such as text-to-image, Avatar creation and edited images for purposes of labeling data for use in machine learning and improve and develop the features and Services. Note that labeled data is not tied to any identified individual.</p>	<p>our services though AI machine learning, you ask us to delete all your information and your account, or in accordance with our data retention policies.</p>

Please note that we do our best to moderate the setting of the AI Tools Output to not include any inappropriate or harmful content, however, it is your sole responsibility to upload images, photos, videos, audio recordings and other content that is not unlawful, libelous, defamatory, obscene, pornographic, indecent, lewd, suggestive, harassing, threatening, invasive of privacy or publicity rights, abusive, inflammatory, fraudulent, or can be otherwise interpreted as harmful content. Please contact us at dpo@lightricks.com if you find any content to be offensive. **The use of the AI technologies is subject to the AI Terms as well, available at: <https://static.lightricks.com/legal/ai-terms-of-use.pdf#page18>.**

TABLE C: POPULAR PAYS MARKETPLACE & CAMPAIGN TOOLS

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS (UNDER THE GDPR)
<p><u>Brands Registration and Account:</u></p> <p>When the Brands sign up on Popular Pays Marketplace or the Campaign Tools, it shall fill in the contact information of its authorized users (name, phone number, email address, etc.).</p> <p>Following registration and creation of the Brand account, the Brand will have access to the dashboard which will include further data regarding its campaigns, statistics and</p>	<p>We use this information to create an account, provide account management, enable your interaction with the Creators and, as applicable, usage of the Campaign Tools, perform the marketing campaigns, provide support and any requested Services.</p> <p>The campaign insights are provided in an aggregated analytic manner.</p>	<p>Processing is necessary for the performance of our contract with the Brand.</p> <p>Data processed for campaign insights is processed by us on behalf of the Brand, in our role as Processor (as such terms is defined under the GDPR or equivalent term under applicable laws), as further detailed below.</p>

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS (UNDER THE GDPR)
analysis regarding its campaigns, user engagement, etc.		
<p><u>Creator Registration and Account:</u></p> <p>A Creator will need to create a portfolio and account which will include full name, email address, age, gender, location, shipping address, demographic data, payment information (which will include your bank account details or Apple-Pay/Google-Pay account), your profession or specializations (e.g., lifestyle, fashion, beauty, financing planning), language preferences, etc.</p> <p>You will further be requested to grant us with access to your social media account (“Creator Social Media Accounts”). We will process certain information made available through the Creator Social Media Accounts such as profile picture and information related to your followers (followers count, age range, territories, etc.)</p> <p>The above shall be collectively referred to as “Creator Portfolio Data”.</p> <p>In addition, in order to participate in campaigns, the Creator will need to upload its creations to the portfolio, integrate its social media accounts through which Brands will be able to review the Creator’s work, bio and the</p>	<p>We use the Creator Portfolio Data to create and verify your account, including the portfolio, and to make it available for Brands to review, enable your interaction with the Brands, provide account management, provide support and any requested Services.</p> <p>We will further use the Creator Portfolio Data to create aggregated insights on your audience and content (e.g., gender, age range, geo location, etc.) in order to enable our Services, including to enable “match” between you and the applicable Brands’ needs (e.g., the targeted audience for the Brand’s campaign).</p>	<p>Creator Portfolio Data is necessary for the performance of our contract with the Creator.</p> <p>The insights are processed subject to our legitimate interest.</p> <p>The creations you upload may also include Personal Data, however, we are the Processor (as such terms is defined under the GDPR or equivalent term under applicable laws) of such Personal Data, hosting the creations on your behalf.</p>

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS (UNDER THE GDPR)
type of followers the Creator interacts with.		
<p><u>Content On Creator Media Processed for Brands' Evaluation Process:</u></p> <p>- <u>Creators:</u></p> <p>Upon Creators' registration to our Popular Pays Marketplace, we may process the content, posted, uploaded or otherwise made available by Creator through the Creator media network, including the Creator's Social Media Accounts or other applicable media such as websites, blogs, posts, etc. (respectively the "Media").</p> <p>- <u>Non-Registered Creators:</u></p> <p>We may process the content made available on Media from individuals that have not signed-up to our Popular Pays Platform ("Non-Registered Creators"), in the event a Brand request us to conduct an evaluation process with regards to the Non-Registered Creator and in such event, we may further process your email address or other contact communications, your Social Media Account and certain information made available therein such as your name, profile picture, social media accounts, and audience (followers count, territory, etc.).</p>	<p>We process the Creator Media Content as part of our Services and Campaign Tools, to support the Brands' process of evaluating your applicability to their advertising campaign, in connection with the Brands' certain criteria related to the reputation they wish to maintain when running marketing campaigns and their content restrictions policies.</p> <p>For such process, certain Creator Media Content will be processed by us, including by using automated tools and AI tools, to indicate if certain content criteria might be included.</p> <p>The Creator Media Content evaluation process is intended to ensure Creators' and Non-Registered Creators' applicability and compliance with our Brands' criteria and codes of conducts, prior to offering the Creator or Non-Registered Creator to participate in such Brand's marketing campaign.</p> <p>We will store and maintain the specific Creator Media Content indicated as content that includes certain categories and criteria for the provisions of the Services (to Creators and Brands, as applicable) as well as for future evaluation of</p>	<p>The processing related to our registered Creators is made based on contract necessity.</p> <p>The processing related to Non-Registered Creators is made based on our and our Brands' legitimate interest, to offer you to join our Popular Pays Marketplace and potentially participate in the Brands' campaigns, and to provide a service enabling to conduct a prior evaluation and a vetting process of content creators and influencers applicability to Brands' marketing campaigns, prior to offering participation. Non-Registered Creators has the right to opt-out from our processing of such information by submitting their request at here, or by sending us an email at: dpo@lightricks.com.</p>

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS (UNDER THE GDPR)
<p>The content processed uploaded to the Media by Creators and Non-Registered Creators, which may include, without limitations, images videos and posts, shall be collectively referred to as the “Creator Media Content”)</p>	<p>potential cooperation and engagement with Creators and No-Registered Creators by our Brands.</p> <p>The information we provide our Brands is intended solely to assist their vetting process however we do not, and we prohibit our Brands, to use this information for any automated decision making or profiling purposes. The information is provided to our Brands subject to contractual obligations that limit the use to the purposes described above and prohibits the unauthorized use of the information.</p> <p>We further process the Non-Registered Creator contact information to communicate with you and offer you participation in our Service or collaboration with a Brand, etc.</p>	
<p><u>Usage Data:</u></p> <p>We collect information on how, when and where you use the Service, access the account, and actions conducted on the Popular Pays Marketplace or through the usage of our Campaign Tools, as applicable.</p>	<p>We use this information solely for the purpose of improving the Services, fixing bugs and errors.</p>	<p>Processing of such data is made subject to our legitimate interest.</p>
<p><u>Customer Support:</u></p> <p>When you contact us for customer support, we will process your contact information, as well as any information you choose to provide as part of our</p>	<p>We will use the contact information to provide the customer support needed. We will retain the correspondence with you, and where applicable the call records, for as long as needed, and to evidence the support was provided, offers</p>	<p>We process such information to provide the support services for performing our contract with you.</p> <p>We will further retain our communications for records keeping and services improvement, including to train</p>

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS (UNDER THE GDPR)
communications and correspondence and, where applicable, our call records.	being made or agreed, etc., as well as to further improve our Services and support.	our customer support team, based on our legitimate interest. Call records will be processed subject to your consent which will be obtained at the beginning of our conversation.
<p><u>Direct Marketing:</u></p> <p>We will use your information and contact information to send you marketing promotions, such as new features, additional offerings, special opportunities or any other information we think you will find valuable.</p>	We process and use this information to keep you updated with offers and content.	We process such information subject to our legitimate interest. You can opt-out at any time through the “ unsubscribe ” link within the email at any time, provided however that operational and service-related messages (e.g., invoices) will still be sent.
<p><u>Campaigns:</u></p> <p>As a Brand, we provide services that enable you to deliver relevant content to end users, by targeting specific audience.</p> <p>The targeted campaign will be directed to potential customers who appear to have the same or similar interests as the Brand’s existing customers, based on the segments we collect and analyze (“Insights”).</p>	We use such Insights for targeting campaigns on behalf of the Brand, as part of the services provided through the Popular Pays Marketplace.	We process this data on behalf of the Brand as a Processor (as such terms is defined under the GDPR or equivalent term under applicable laws) and subject to the Brand’s instructions.
<p><u>Booking a Demo:</u></p> <p>In the event you choose to book a free demo, you will be requested to provide us with your full name, phone number, and company email address.</p>	We will use this information to provide you with the information or Services that you have requested, as well as for Direct Marketing (as explained above).	We process such information subject to our legitimate interest.
<p><u>Purchase and Transactions Details:</u></p> <p>Certain features and Services are subject to payment, either</p>	We use this information to process your payments, perform the Services and transactions.	We process such information to provide the Services and perform our contract with you.

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS (UNDER THE GDPR)
<p>IAP in which Google Play or Apple Store terms would govern such payments, or subscription payments by third party payment processor services (such as Adyen, Stripe, Braintree, and PayPal); however, we process the commercial transaction data such as, records of transactions, amounts, purchases and prices; shipping details (if applicable); address, contact telephone number and email address.</p>	<p>Any information related to your payment means and the transactions are processed by the third parties' platforms or IAP will be governed by such third parties' own privacy policy and terms, which we recommend that you review.</p>	<p>We may further use such information to analyze our Services and their performance, as well as to customize and improve our offers and Services, based on our legitimate interests.</p>

TABLE D: PROSPECTS AND INDIVIDUALS INTERACTION WITH OUR WEBSITE, ADS OR DIGITAL ASSETS

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS (UNDER THE GDPR)
<p><u>Online Identifiers and Usage Data:</u> When you interact with our website or other digital assets, we, directly or indirectly collect Online Identifiers and Usage Data (i.e., access time and date, movement within the website, click stream, duration, referred URLs, content viewed, etc.).</p>	<p>We process this information to improve the website, identify errors and bugs as well as for statistic, analytic and marketing purposes.</p>	<p>The Personal Data processed for operating the website and our digital assets, through first party cookies, is based on our legitimate interest.</p> <p>Depending on your jurisdiction, third-party cookies will be able to process Personal Data solely if you provided consent through the consent management tool that is used on the website.</p> <p>You may withdraw consent or otherwise change your preferences at any time by using the cookie preference settings tool.</p>
<p><u>Advertising:</u> When we market the Services, we use third party providers or tools to manage these ad</p>	<p>To perform, facilitate and optimize our marketing campaigns, ad management and sales operations, and to manage and deliver</p>	<p>We process the Personal Data subject to your consent through in-app permission or cookie</p>

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS (UNDER THE GDPR)
<p>campaigns. Through these tools, we collect information such as the individuals’ journey, when they clicked our ad and if they subscribed or engaged with such campaign or ad.</p>	<p>advertisements for our products and Services more effectively, including on other websites and applications.</p>	<p>consent management tool, as applicable.</p>
<p>Contact Information:</p> <p>If you voluntarily contact us through chat, email or other means, or if you fill in a survey, or provide feedback, you will be required to provide us with certain information such as your name, email address, and any additional information you decide to share with us.</p> <p>If you are contacting us on behalf of another person, we value your assistance and care for others, please note that it is your responsibility to make sure that any person whose Personal Data you provide is aware of the principles of this Privacy Policy and agrees that you will provide Personal Data to us on this basis.</p>	<p>We process the information to respond to your inquiry. We may also process the correspondence information in order to improve our sales services or customer support and for record keeping purposes.</p>	<p>We process the information subject to our legitimate interest. We may keep such correspondence if we are legally required to or where we otherwise deem it is needed.</p>
<p>Call Records:</p> <p>When contacting our Prospect, we might record the calls.</p>	<p>We use such call records in order to manage, measure and improve our sales efforts and enhance our Services.</p>	<p>We process call records subject to your consent which will be obtained at the beginning of our conversation.</p>
<p>Newsletter Registration:</p> <p>In the event you sign up to receive our newsletter, blog updates or other marketing materials, you will be requested to provide your contact details, such as your email address.</p>	<p>We will use your information in order to send you our newsletter and other marketing materials.</p>	<p>We process such contact information subject to your consent. You may withdraw consent at any time through the “unsubscribe” link within the email or by contacting us directly.</p>

Please note that the actual processing operation per each purpose of use and lawful basis detailed in the table above may differ. Such processing operation usually includes a set of operations made by automated means, such as collection, storage, use, disclosure by transmission, erasure, or destruction. The transfer of Personal Data to third-party countries, as further detailed below under Section 11 – ***International Data Transfer***, is based on the same lawful basis as stipulated in the table above.

In addition, we may use certain Personal Data to prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity thefts, and any other misuse of the Services and to enforce the Terms, as well as to protect the security or integrity of our databases and the Services, and to take precautions against legal liability. Such processing is based on our legitimate interests.

We may collect different categories of Personal Data and Non-Personal Data from you, depending on the nature of your interaction with the Services provided through the website, Apps, web-services and the Popular Pays Marketplace, as detailed above. If we combine Personal Data with Non-Personal Data, the combined information will be treated as Personal Data for as long as it remains combined.

5. HOW WE COLLECT YOUR INFORMATION

Depending on the nature of your interaction with us, we may collect the above detailed Personal Data from you, as follows:

- Automatically, when you visit our website or interact with our App and Services, including through the use of cookies (as detailed below) and similar tracking technologies, as well as, where applicable, information created by our AI Tools and information gathered through our Campaign Tools.
- When you voluntarily choose to provide us with information, such as when you create an account, contact us or request a demo, all as detailed in this Policy.
- By our third parties service providers which collect Personal Data on our behalf, such as analytics service providers.

6. COOKIES AND SIMILAR TECHNOLOGIES

We may use cookies, tracking pixels (also known as clear GIFs and web beacons), third party software development kits (SDKs) as detailed in [Table A](#) above, and other technologies in order to maintain, provide, and improve our website, Apps and Services. **We use Cookies for various purposes:**

- **Strictly Necessary Cookies:** these cookies are necessary for our website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but then some parts of the website will not work.
- **Functional Cookies:** these cookies enable the website to provide enhanced functionality and personalization (e.g., remembers your preferences so you don't have to re-set them each time you visit). They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies then some or all of these services may not function properly.

- **Performance and Analytics Cookies:** these cookies allow us to count visits and traffic sources so we can measure and improve the performance of our website. They help us to know which pages are the most and least popular and see how visitors move around the website. If you do not allow these cookies we will not know when you have visited our website, and will not be able to monitor its performance.
- **Marketing and Targeting Cookies:** these cookies allow us to know whether or not you've seen an ad or a type of ad, how you interacted with such an ad, and how long it has been since you've seen it. We also use cookies to help us with targeted advertising. We may partner with ad networks and other ad serving providers that serve ads on behalf of us and others on non-affiliated platforms. Some of those ads may be personalized, meaning that they are intended to be relevant to you based on information ad networks and ad serving providers collect about your use of our website and other sites or apps over time, including information about relationships among different browsers and devices. This type of advertising is known as interest-based advertising.

The third-party cookies we currently use and purpose of use are listed under the Cookies Setting tool available on our website, which you may further use to opt-out of cookies or change your preferences any time.

Also note that, most browsers will allow you to erase cookies from your computer's hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. You may set your browser to block all cookies, including cookies associated with our website, or to indicate when a cookie is being used by us, by adjusting the privacy and security settings of your web browser. Please refer to the support page of your browser to learn more about how you can adjust your privacy and security settings. Please note that once you choose to opt out or disable cookies, some features of the website may not operate properly and your online experience may be limited.

Where we use third-party advertising cookies, such third-party may independently collect, through the use of such tracking technologies, some or all types of Personal Data detailed above, as well as additional data sets, including to combine such information with other information they have independently collected relating to your online activities across their network of websites, for the purpose of enhanced targeting functionality and delivering personalized ads, as well as providing aggregated analytics related to the performance of our advertising campaign you interacted with. These third parties collect and use this information under their own privacy policies, and are responsible for their practices.

7. DATA SHARING – CATEGORIES OF RECIPIENTS WE SHARE PERSONAL DATA WITH

We share your Personal Data with third parties, including our partners or service providers that help us provide our Services. You can find here information about the categories of such third-party recipients.

CATEGORY OF RECIPIENT	DATA THAT MAY BE SHARED	PURPOSE OF SHARING
Essential Service Providers, which process data on	All data except for data which is stored	We may disclose Personal Data to our trusted service providers that provide technology or platforms that are essential for providing the Services (" Essential Service

<p>our behalf, for the purpose of providing the Services, securing and improving the Services.</p>	<p>locally on your device.</p>	<p>Providers”). Such Essential Service Providers include hosting, and server co-location services, communications and content delivery networks (CDNs), internet service providers, operating systems and platforms, data and cyber security services, fraud detection services, billing and payment processing services, shipping and handling services, session or activity recording services, AI tools, support and customer relation management systems. Essential Service Providers have access, or process on our behalf. The Essential Service Providers are prohibited from using your Personal Data for any purposes other than providing us with requested services.</p>
<p>Marketing Service Providers</p>	<p>Usage Data, Online Identifiers, Registration Data, Account Data.</p>	<p>Our marketing service providers, that either process on our behalf certain data which we use to target you and offer you our Services, or they provide us with tools to do so (“Marketing Service Providers”).</p>
<p>Consultants</p>	<p>Account Data and Registration data, contact information, and any other data except for data which is stored locally on your device.</p>	<p>Our legal, financial and compliance advisors (“Consultants”) may be exposed to certain Personal Data. The Consultants are bound by privilege obligations or confidentiality agreements and are prohibited to share any Personal Data except for providing the services we requested.</p>
<p>Third-Party Platforms & Brands</p>	<p>Registration data, creations, Popular Pays Marketplace and Campaign Tools activity, Creator Media Content.</p>	<p>Our services may include links to third-party websites, and integrations with third-party services. Such websites and third-party services, and any information you process, submit, transmit, store or otherwise use with such websites and third-party services, are beyond the scope of Lightricks’ terms of use and Privacy Policy and will therefore be governed by such third-party’s terms and privacy practices and policies, and not by this Privacy Policy. Moreover, if the Services integrate with a third-party service, the API that performs the integration will enable the relevant third party to serve you certain content as well as access some of your content. For example, if you wish to upload or otherwise share your content to an integrated third-party service such as Instagram or TikTok, or to make use of certain functionality in those services, the API will enable the applicable third party to access your content (such as your photo library).</p> <p>In addition, we share certain Personal Data gathered from Creators with Brands participating in our Popular Pays</p>

		Marketplace or using the Campaign Tools, including Creator Profile and Creator Media Content, as defined and explained under Table C above.
Other Users	Creations, name, contact information, bio.	Due to the nature of the Apps and the Lightricks Feed feature, certain Personal Data available in the Apps is visible to other Lightricks Users in that App, for example your username, likes and comments on other content. We will never share your photos or videos with other Users unless you actively choose to do so.
Subsidiaries and Affiliated Companies	All data except for data which is stored locally on your device.	We may share Personal Data, internally within our group or in the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation or asset sale). In the event of the above, our affiliated companies or acquiring company will assume the rights and obligations as described in this Policy.
Third Parties, Authorities, Security Providers, Governmental Agencies, or Authorized Third Parties.	Any data except for data which is stored locally on your device, depending on the purpose and needs.	For protecting rights and safety of our Services and Apps, we may share Personal Data with others if we believe in good faith that this will help protect the rights, property or personal safety of users or individuals, or any members of the general public. This will include legal and law enforcement purposes, meaning, in response to a verified request relating to terror acts, criminal investigations or alleged illegal activity or any other activity that may expose us, you, or any other user to legal liability, and solely to the extent necessary to comply with such purpose. Such disclosure or access may occur if we believe in good faith that: (a) we are legally compelled to do so; (b) disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing; or (c) such disclosure is required to protect our legitimate business interests, including the security or integrity of our services.

When we share data with service providers and partners, we ensure they only have access to such information that is strictly necessary for us to provide the Services. These parties are required to secure the data they receive and to use the data for pre-agreed purposes only while ensuring compliance with all applicable data protection regulations (such service providers may use other Non-Personal Data for their own benefit).

8. YOUR RIGHTS

We acknowledge that different people have different privacy concerns and preferences. Our goal is to be clear about what information we collect so that you can make meaningful choices about how it is used. We allow you to exercise certain choices, rights, and controls in connection with your information. Depending on your relationship with us, your jurisdiction and the data protection laws that apply to you, you have the right to control and request certain limitations or rights to be executed.

The principal rights that may apply to your Personal Data (subject to your jurisdiction and additional conditions) may include:

Right to be informed, right to know, and right to a list of specific third parties	<p>You have the right to be provided with information regarding our Personal Data collection and privacy practices, as we detail under this Privacy Policy. You may also have the right, at our option, to receive a list of the specific third parties to which we have disclosed either your Personal Data or any Personal Data.</p> <p>This Privacy Policy also details our Personal Data handling practices.</p>
Access rights, right to inspect your Personal Data	<p>You have the right to confirm whether we collect Personal Data about you and to know which Personal Data we specifically hold about you, as well as receive a copy of such or access it. If you wish to receive a copy of the Personal Data, please submit the Data Subject Request available here and send it to our DPO: dpo@lightricks.com</p>
Right to correction/rectification	<p>You have the right to correct inaccuracies in your Personal Data in the event you found it incorrect, outdated, etc. (or otherwise request its deletion), taking into account the nature and purposes of each processing activity. If you wish to exercise this right, please submit the Data Subject Request available here and send it to our DPO: dpo@lightricks.com</p>
Right to be forgotten, right to deletion	<p>You have the right to request the deletion of certain Personal Data we process, if specific conditions are satisfied, for example, if you think we no longer need to use it for the purpose we collected it; in the event that the collection was based on your consent; where we have used it unlawfully, or; where we are subject to a legal obligation to delete your Personal Data. Deletion request will be subject to our rights and obligations under applicable law (for example, our legitimate interests to maintain record keeping, completing transactions, providing a service that you have requested, taking actions reasonably anticipated within the context of our ongoing business relationship with you, detecting security incidents, protecting against illegal activity; debugging; exercising right provided for by law, etc.).</p> <p>If you wish to exercise this right, please submit the available here and send it to our DPO: dpo@lightricks.com</p> <p>You are not required to create an account with us to submit a deletion request.</p>
Right to portability	<p>You have the right to obtain the Personal Data in a portable, and to the extent technically feasible, readily usable format that allows you to</p>

	<p>transmit the data to another entity without hindrance. We will select the format in which we provide your copy.</p> <p>If you wish to exercise this right, please submit the Data Subject Request form available here and send it to our DPO: dpo@lightricks.com</p>
<p>Right to withdraw consent.</p> <p>Right to opt out from:</p> <p>(i) “sale” or “share” of Personal Data (as defined under US laws);</p> <p>(ii) Targeted advertising; and</p> <p>(iii) Profiling and automated decision making</p>	<p><u>Where we process Personal Data based on your consent, you have the right to withdraw such consent at any time.</u></p> <p>For example - you have the right to withdraw consent from receiving any marketing communication from us or otherwise opt-out, by unsubscribing through the message received. You have the right to opt-out or otherwise withdraw consent from processing of Personal Data through our use of cookies, by changing your preferences through the cookie setting tool available on our website. You have the right to withdraw consent from processing of Face and Voice Recognition Models from the App’s Privacy Settings.</p> <p>If and to the extent applicable, you have the right to opt out of the “sale” or “share” of your Personal Data, which includes opting-out of our practice of using cookies for the purposes of targeted advertising, analytic, etc., by clicking on the “Do Not Sell or Share My Personal Information” link on our website or communicating your opt out through opt-out preference signals, like Global Privacy Control (learn more here).</p> <p>In any event, please keep in mind that opt-out tools are limited to the browser or device you use because they work off your browser ID and device ID and, accordingly, you will need to opt-out on each browser and device you use. Your browser may save some information in its cookies and cache to maintain your privacy preferences. Clearing these may remove opt-out preferences, requiring you to opt-out again.</p> <p>We do not profile you in a manner that has a significant effect on you or other individuals, therefore we do not provide an opt-out option from such use of Personal Data.</p>
<p>Right to Object</p>	<p>You have the right to object to any use of your Personal Data which we have justified by our legitimate interest if you believe your fundamental rights and freedoms to data protection outweigh our legitimate interest.</p> <p>If you wish to exercise this right, please submit the Data Subject Request form available here and send it to our DPO: dpo@lightricks.com</p>
<p>Right to Restrict Processing</p>	<p>You have the right to ask us to restrict or limit the purpose for which we process your Personal Data, where certain conditions are satisfied (for example, where you contest the accuracy of the Personal Data, for a period enabling us to verify its accuracy).</p> <p>If you wish to exercise this right, please submit the Data Subject Request form available here and send it to our DPO: dpo@lightricks.com</p>
<p>Right to appeal or lodge a complaint</p>	<p>If we decline to take action on your request, we will inform you without undue delay as required under applicable laws. The notification will include a justification for declining to take action and instructions on how</p>

	<p>you may appeal, if applicable. Within the timeframe set under applicable law as of our receipt of your appeal, we will inform you in writing of any action taken or not taken in response to your appeal, including a written explanation of the reasons for the decisions. If the appeal is denied, you may submit a complaint to the applicable authority.</p> <p>Where the GDPR applies, you have the right to lodge a complaint with the applicable Data Protection Authority in the EU or the Information Commissioner in the UK.</p>
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For additional information on your rights and how to exercise your rights, please see the Data Subject Request Form (“**DSR**”) form available [here](#) and send it to our DPO: dpo@lightricks.com.

Further, certain rights can be exercised from the App: you may correct, revise and delete information using the App settings at any time, any consent provided may be easily withdrawn (for example, for Face and Voice Recognition Models, and consent to AI Training Data, through the App Privacy Settings), and you may opt-out from certain features and tracking, therefore we recommend you use the technical solutions we have provided you with to exercise your rights. Please further note that, AI Tools Output may contain Personal Data about you that you deem inaccurate, and if you would like us to correct the inaccuracy you may submit a correction request as detailed above, however given the technical complexity of how our AI tools work, we may not be able to correct the inaccuracy in every instance. In that case, you may request that we delete your Personal Data from the AI Tools Outputs.

9. DATA RETENTION

In general, **unless a different retention period is described above**, we retain the Personal Data we collect for as long as it remains necessary for the purposes set forth above, when permissible by law or regulation, or until you request to delete your information, where applicable.

Other circumstances in which we may retain your Personal Data for longer periods of time when permissible by law or regulation include: (i) where we are required to do so in accordance with legal, regulatory, tax, or accounting requirements; (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges; or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data.

Please note that except as required by applicable law or our specific agreements with you, we will not be obligated to retain your Personal Data for any particular period, and we are free to securely delete it or restrict access to it for any reason and at any time, with or without notice to you. If you have any questions about our data retention policy, please contact us by e-mail at: dpo@lightricks.com.

10. SECURITY MEASURES

We implement appropriate and industry-standard technical, organizational, and security measures to reduce the risks of damage to (or loss of) information, or any unauthorized access or use of information. This includes a protocol for responding to a data security incident that may compromise the security of Personal Data, including biometric data and identifiers, and providing notice to impacted individuals. However, these measures do not provide absolute information security. Therefore, although efforts are made to secure your Personal Data, it is not guaranteed, and you cannot expect that the Services will be

immune to information security risks or attacks. Also, as the security of information depends in part on the security of the computer, device or network you use to communicate with us, the security of your Personal Data depends on you as well. Please make sure to take appropriate measures to use secured networks, devices and to protect your access credentials.

Please contact us at: dpo@lightricks.com if you feel that your privacy was not dealt with properly, in a way that was in breach of our Privacy Policy, or if you become aware of a third party's attempt to gain unauthorized access to any of your Personal Data. We will make a reasonable effort to notify you and the appropriate authorities (if required by applicable law) in the event that we discover a security incident related to your Personal Data.

11. INTERNATIONAL DATA TRANSFER

Our data servers in which we host and store the information are located globally including in the US and EU. The headquarters are based in Israel where we may access the information stored on local servers, cloud-hosting servers or other systems and platforms used. In the event that we need to transfer your Personal Data out of your jurisdiction, we will take appropriate measures to ensure that your Personal Data receives an adequate level of protection as required under applicable law. Furthermore, when Personal Data that is collected within the European Economic Area ("EEA"), United Kingdoms or Swiss, is transferred outside of such jurisdiction, to a country that has not received an adequacy decision from the European Commission or the ICO, we will take necessary steps in order to ensure that sufficient safeguards are provided during the transferring of such Personal Data, in accordance with the provision of the EU, UK or Swiss Standard Contractual Clauses or, as applicable the EU/UK-US Data Privacy Framework. Thus, we will obtain contractual commitments or assurances from the data importer to protect your Personal Data, using contractual protections that regulators have pre-approved to ensure your Personal Data is protected.

12. ELIGIBILITY AND CHILDREN'S PRIVACY

The Services are not intended for use by children (the phrase "child" shall mean an individual that is under the age defined by applicable law), and we do not knowingly process children's information. We will discard any information we receive from a User that is considered a "child" immediately upon discovering that such a User shared information with us. Please contact us at: dpo@lightricks.com if you have reason to believe that a child has shared any information with us. Where required under applicable laws, we will require parental consent for participation in our Services related to the Popular Pays Marketplace by individuals under the applicable age.

13. JURISDICTION-SPECIFIC NOTICES

Information provided below supplements the information contained in this Privacy Policy and applies to residents of such states. These additional disclosures are intended to provide you with additional information with regard to our handling of your Personal Data and certain consumer rights.

i. Additional Notice to California Residents:

This section applies only to California residents. Pursuant to the CCPA.

Please see the [CCPA Privacy Notice](#) which discloses the categories of "personal information" collected, purpose of processing, source, categories of recipients with whom the "personal information" is shared

for a “*business purpose*”, whether the personal information is “*sold*” or “*shared*”, the retention period, and how to exercise your rights as a California resident.

ii. Additional Notice to US Residents:

Residents of certain U.S. states (depending on the applicable state law, acting as an individual or in the household context only and not in a commercial or employment context, as a job applicant or as a beneficiary of someone acting in an employment context or as representative of a business), may have additional rights under applicable privacy laws and be entitled to additional disclosures.

“**Personal Data**” under applicable US privacy laws, generally means any information that is linked or reasonably linkable to an identified or identifiable individual (and usually does not include publicly available information that is lawfully made available from government records, or that a consumer has otherwise made available to the public; de-identified or aggregated consumer information; or information excluded from the states laws scope.

“**Sensitive Data**” includes data revealing racial, ethnic or national origin; religious beliefs; information regarding an individual’s medical history, mental or physical health condition, diagnosis or medical treatment; neural data; status as transgender or non-binary; sex life or sexual orientation; status as a victim of a crime; citizenship or immigration status; genetic or biometric data; Personal Data collected from a known child; and precise geolocation data. We will obtain your consent before collecting Sensitive Data, such as the biometric identifiers described above in [Section 4](#), even if they are not used to identify you.

We are required to provide you with a clear and accessible privacy notice that includes the categories of Personal Data processed, including any Sensitive Data, the purpose of processing, the categories of Personal Data shared with third parties, the categories of third parties with whom Personal Data is shared, the categories of Personal Data that is sold or used for targeted advertising, if any, the categories of third parties to whom the Personal Data is sold, if any, a list of your data rights and instructions for exercising those rights and appealing decisions, and out contact information. This information is detailed under this Privacy Policy and further below.

Categories of Personal Data & Categories of Third Parties with Whom Personal Data is Shared:

Under [Section 4](#) of the Privacy Policy “**Personal Data Sets We Process & Purpose of Collection and Use**”, we describe our collection and processing of Personal Data, the categories of Personal Data that are collected or processed, and the purposes for which Personal Data is processed, stored or used. We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated, or incompatible purposes without obtaining your consent, unless we are otherwise entitled, required or permitted under applicable laws.

Additionally, under [Section 7](#) of the Privacy Policy “**Data Sharing – Categories of Recipients We Share Data with**” we detail and disclose the categories of third parties we share Personal Data with for a business purpose.

“Sale” of Personal Data:

Under US privacy laws, in principle, the term “sale” refers to disclosing or making available Personal Data to a third-party in exchange for monetary or other valuable consideration, including for targeted advertising purposes. We do not “sell” information as this term is commonly understood, meaning - we do not, and will not, disclose your Personal Data in direct exchange for money or some other form of payment. However, subject to the definition of the term “sale” under applicable US privacy laws, our practice of using “cookies or other third-party advertising services and sharing Personal Data for such purpose to third party advertising

and marketing providers (e.g., providers of marketing tools and analytic tools, advertising networks, social media networks, media buying, search platforms) is considered a “sale”.

Such practice includes the following Personal Data categories shared with these third parties:

Identifiers – online identifiers such as IP and Cookie ID;

Internet and electronic network activity information – such as your engagement with our website and ads.

Geolocation data – derived from IP .

Consumer Rights Related to Their Personal Data:

Residents of certain U.S. states may have additional rights under applicable privacy laws, subject to certain limitations, which may include:

Access – the right to confirm whether we are processing their Personal Data and to obtain a copy of their Personal Data in a portable and, to the extent technically feasible, readily usable format.

List of Third Parties – the right to receive a list of the specific third parties to which we have disclosed either your Personal Data or any Personal Data.

Delete – the right to request us to delete their Personal Data provided to or obtained by us.

Correct – the right to request us to correct inaccuracies in their Personal Data, taking into account the nature and purposes of the processing of the Personal Data.

Opt-Out – the right to opt out of certain types of processing, including: (i) to opt out of the “sale” of their Personal Data; (ii) to opt out of targeted advertising by us; and (iii) to opt out of any processing of Personal Data for profiling in furtherance of making decisions that produce legal or similarly significant effects. However, as noted above, we do not engage in profiling in furtherance of legal or similarly significant decisions.

Appeal – the right to appeal if we decline to take action in response to your exercise of a privacy right.

Non-Discrimination – the right to not be discriminated against for exercising your privacy rights.

Section 8 under this Privacy Policy “**Your Rights**” provides additional information regarding your principal rights.

Exercising Consumer Privacy Rights:

You may submit a request to exercise most of your privacy rights under U.S. state privacy laws by submitting a Data Subject Request form available [here](#) or sending an email to our DPO: dpo@lightricks.com.

Further, certain rights can be exercised from the App: you may correct, revise and delete information using the App settings at any time. Additionally, any consent provided may be easily withdrawn (for example, for Face and Voice Recognition Models and consent to AI Training Data through the App Privacy Settings), and you may opt-out from certain features and tracking. Therefore, we recommend you use the technical solutions we have provided you to exercise your rights.

For certain rights, we will take steps to verify your identity and your request by matching the information provided by you with the information we have in our records. In some cases, we may request additional information to verify your identity, or where necessary to process your request. If we are unable to verify your identity after a good faith attempt, we may deny the request and, if so, will explain the basis for denial and how to remedy any deficiencies, where applicable.

Authorized agents may initiate a request on behalf of another individual, provided that they provide proof of their authorization, and we may also require that the individual directly verify his/her identity and the authority of the authorized agent.

We will respond to your request within the timeframe required under applicable law, and we reserve the right to extend the response time subject to applicable law requirements. If we refuse to take action on a request, we will notify you and our notification will include a justification for declining to take action and instructions on how you may appeal. Within the timeframe set out under applicable law of our receipt of your appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied, you may submit a complaint to the applicable authority or Attorney General of your jurisdiction.

iii. Additional Notice to Brazil Residents:

We have created this section specifically for users in Brazil. Users in Brazil have certain privacy rights as specified under Brazilian law, including the Lei Geral de Proteção de Dados Pessoais (“**LGPD**”). Our Privacy Policy and the privacy controls we offer to all users are in line with these laws—this notice makes sure we cover the Brazil-specific requirements. For example, all users can request a copy of their data, request deletion, and control their privacy settings in the app.

Data Controller information is available above in Section 2.

The lawful basis under the LGPD is **Contract** (complying with the obligations of the agreement we have entered), **Legitimate Interest** (we have the right, the legitimate interest, to do so), **Consent** (we have asked your permission) and **Legal Obligations**. The Tables in [Section 4](#) detail the lawful basis for processing each data set.