

CCPA PRIVACY NOTICE

[Last Modified: February 15, 2024]

This CCPA privacy notice (“**CCPA Notice**”) applies only to California residents (“**consumers**” or “**you**”). It describes how we collect, use, disclose and share “Personal Information” (as defined below) of consumers, and if applicable, candidates or employees, in operating our business. Any terms defined in the California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020 effective January 1, 2023 (collectively “**CCPA**”), have the same meaning when used in this CCPA Notice.

This CCPA Notice is an integral part of our Privacy Policy, and thus, definitions used herein shall have the same meaning as defined in the [Privacy Policy](#).

This CCPA Notice applies to Personal Information, which is collected directly or indirectly while using our Service or in order to provide our Services.

PART I: A COMPREHENSIVE DESCRIPTION OF THE INFORMATION PRACTICES

(A) CATEGORIES OF PERSONAL INFORMATION WE COLLECT

We collect Personal Information which is defined under the CCPA as any information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household or device, all as detailed in the table below. Personal Information further includes Sensitive Personal Information (“**SPI**”) as detailed in the table below.

Personal Information does not include: Publicly available information that is lawfully made available from government records, that a consumer has otherwise made available to the public; De-identified or aggregated consumer information; Information excluded from the CCPA’s scope, such as: Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA) and the Driver’s Privacy Protection Act of 1994.

We have collected the following categories of Personal Information within the last twelve (12) months:

Category	Example	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport	Real name, alias, shipping address, unique personal identifier, online identifier, Internet Protocol address, email address, account name and social account information.

	number, or other similar identifiers.	
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<p>A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p> <p>Some personal information included in this category may overlap with other categories.</p>	Photos, videos, images as part of using the App, and physical characteristics such as gender and skin tone voluntarily provided by you while using the Services.
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Transactions conducted, purchase history and tendencies.
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Interaction with our digital assets including website, landing pages, Apps Lightricks Feed (and your search made therein), and engagement with ads.
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	<p>Inputs (e.g., images, photos, videos, and audio files you upload when you use our Services) and outputs (i.e., the created artwork or other Services features such as Avatars, etc., including AI Tools Outputs), Voice Model, Face Model – all terms as defined and explained under our Privacy Policy;</p> <p>Effects added to photos through editing tools within the Services;</p> <p>Call records when you are communicating with our sales team or customer support.</p>

I. Professional or employment-related information.	Current or past job history or performance evaluations.	Governed by our internal policies, and where applicable (for candidates), as detailed under our Job Candidate Privacy Notice .
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Inferred demographic data such as age (or age group), gender and skin tone, and certain inferred data of users' preferences, characteristics and behavior data.
L. Sensitive personal information.	Government-issued identifying numbers, financial account details, genetic data, precise geolocation, race or ethnicity, religious or philosophical beliefs, union membership, mail, email, text messages, biometric data, health data, and sexual orientation or sex life.	We do not collect SPI. Note that do not deem the data we collect, including Face Models and Voice Models (as defined under Privacy Policy), or other to be biometric data under the CCPA because they are not used to uniquely identify a consumer or a household. However, we only use Voice Models and Face Models for certain permitted purposes for SPI under the CCPA, such as to provide the services or goods you requested; prevent, detect, and investigate security incidents; resist malicious, deceptive, fraudulent, or illegal actions directed at our business; and verify or maintain the quality or safety of our products, services, or devices. In addition, we will obtain your consent before processing such Personal Information and you may exercise your rights, at any time, including to withdraw consent for us to process your Face Models and Voice Models or request its deletion (as part of a deletion request of all your information and your account, as detailed below).

(B) CATEGORIES OF SOURCES OF PERSONAL INFORMATION

- Directly and indirectly from activity on our Services: For example, from submissions through our website portal or website usage details collected automatically from measurement tools.
- Directly from you: For example, from forms you complete, contact us, requesting a demo, account registration, Inputs you upload, etc.

- From third-parties: For example, from vendors who assist us in performing services for consumers, advertising networks, internet service providers, data analytics providers, social networks.
- Publicly accessible sources; For example, if you log-in to our App through your social media account, and depending on your privacy settings defined under such accounts.

(C) USE OF PERSONAL INFORMATION

We may use the Personal Information collected as identified above, for the following purposes: To fulfill or meet the reason you provided the Personal Information (support, respond to a query, open an account etc.); monitor and improve our Services; provide our Services; marketing our Services; analyzing our Services and your use of the services; respond to law enforcement; or otherwise as detailed in our [Privacy Policy](#).

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

(D) DISCLOSURES OF PERSONAL INFORMATION FOR A BUSINESS PURPOSE

We may disclose your Personal Information to a contractor or service provider for a business purpose. When we disclose Personal Information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract, we further restrict the contractor and service provider from selling or sharing your Personal Information. In the preceding twelve (12) months, we disclosed the following categories of Personal Information for a business purpose:

Business Purpose (as defined under CCPA)	Category (corresponding with the table above)	Category of Recipient
Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.	Category A Category F	Advertising networks; data analytics providers; social media networks.
Helping to ensure security and integrity to the extent the use of your Personal Information is reasonably necessary and proportionate for these purposes.	Category A Category B Category F	Subsidiaries, Affiliated companies, operational partner, security and fraud prevention providers, Customer support provider, operating systems.
Debugging to identify and repair errors that impair existing intended functionality	Category A Category F	Security and analytic service providers.
Short-term, transient use, provided the personal information that is not disclosed to another third party and is not used to build a profile about a consumer or otherwise	Category A Category F	Marketing & promotions providers, CRM providers, social

alter an individual consumer’s experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction.		networks, advertising networks.
Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider	Category A Category B Category D Category F Category I Category H Category K	Payment processors, subsidiaries, affiliated companies, operating systems, CRM, ERP, shipping partners, survey providers, customer support, cloud computing and storage vendors, etc.
Undertaking internal research for technological development and demonstration.	Category A Category B Category D Category F	Developers, operating systems, cloud and hosting providers, SaaS platforms for task management and development, customer support and optimization tools.
Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned or controlled by the business.	Category A Category B Category D Category F Category I Category H Category K	Developers, operating systems, cloud and hosting providers, SaaS platforms for task management and development, customer support and optimization tools.

(E) SALE OR SHARE OF PERSONAL INFORMATION

We do not “sell” or “share” information as most people would commonly understand that term, we do not, and will not, disclose your Personal Information in direct exchange for money or some other form of payment.

For retargeting and analytic purposes, when we promote our Services, we use third-party providers and tracking tools, advertising networks and social media. They provide these services by placing cookies, pixel or other tracking technology and sharing with these vendors the online identifiers and online behavior information. The CCPA defines these actions as “sharing” or “selling”.

In the preceding twelve (12) months, we “sell” or “share” the following categories of Personal Information for a business purpose:

Purpose of Sale or Share	Category (corresponding with the table above)	Category Recipient
Targeted advertising, CCBA, promoting the Services, analytics and security services.	Marketing tools, analytic tools, advertising networks, social media networks, media buying, search platforms.	Category A Category F

(F) CHILDREN UNDER AGE 16

We do not knowingly collect information from children under the age of 16.

(G) DATA RETENTION

The retention periods are determined according to the following criteria:

- (i) For as long as it remains necessary in order to achieve the purpose for which the Personal Information was initially processed. For example: if you contact us, we will retain your contact information at least until we will address your inquiry;
- (ii) To comply with our regulatory obligations. For example: transactional data will be retained for up to seven years (or even more under certain circumstances) for compliance with our bookkeeping obligations purposes.
- (iii) To resolve a claim, we might have or a dispute with you, including any legal proceeding between us, until such dispute will be resolved, and following, if we find it necessary, in accordance with applicable statutory limitation periods.

Please note that except as required by applicable law, we will not be obligated to retain your data for any particular period, and we may delete it for any reason and at any time, without providing you with prior notice if our intention to do so.

Notwithstanding the above and as detailed in our Privacy Policy, the following retention periods will apply to Inputs, AI Tools Outputs, Voice Models and Face Models:

- (i) Inputs are usually retained for a short-term period of up to 30 days after the AI Tools Outputs were generated;
- (ii) In the event that outputs of our editing tools, as well as 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;
- (iii) In the event that the Voice Models or Face Models created from your Inputs are processed and stored on the Lightricks Cloud, they will be permanently deleted within up to 3 years after the last time you have used them, or earlier if you ask us to delete all your information and your account or otherwise according to our retention policies;
- (iv) 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.

(v) Any models used to improve and train our AI technology, will be deleted within 180 days.

PART II: EXPLANATION OF YOUR RIGHTS UNDER THE CCPA AND HOW TO EXERCISE THEM

(H) YOUR RIGHTS UNDER THE CCPA

If you are a California resident, you may exercise certain privacy rights related to your Personal Information. You may exercise these rights free of charge except as otherwise permitted under applicable law. We may limit our response to your exercise of these privacy rights as permitted under applicable law, all as detailed herein and the in the Data Subject Request Form available [here](#).

California Privacy Right	Details
The right to know what Personal Information the business has collected and access rights.	The right to know what Personal Information the business has collected about the consumer, including the categories of personal information, the categories of sources from which the Personal Information is collected, the business or commercial purpose for collecting, selling, or sharing Personal Information, the categories of third parties to whom the business discloses Personal Information, and the specific pieces of Personal Information the business has collected about the consumer.
Deletion Rights.	The right to delete Personal Information that the business has collected from the consumer, subject to certain exceptions.
Correct Inaccurate Information	The right to correct inaccurate Personal Information that a business maintains about a consumer
Opt-Out of Sharing for Cross-Contextual Behavioral Advertising (“CCBA”).	You have the right to opt-out of the “sharing” of your Personal Information for “cross-contextual behavioral advertising,” often referred to as “interest-based advertising” or “targeted advertising.”
Opt-out from selling	The right to opt-out of the sale or sharing of Personal Information by the business
Limit the Use or Disclosure of SPI	Under certain circumstances, if the business uses or discloses SPI , the right to limit the use or disclosure of SPI by the business.
Opt-Out of the Use of Automated Decision Making	In certain circumstances, you have the right to opt-out of the use of automated decision making in relation to your Personal Information.
Non-Discrimination	The right not to receive discriminatory treatment by the business for the exercise of privacy rights conferred by the CCPA, including an employee’s, applicants, or independent contractor’s right not to be retaliated against for the exercise of their CCPA rights, denying a consumer goods or services, charging different prices or rates for goods or services, providing you a different level or quality of goods or services, etc. We may, however, charge different prices or rates, or provide a different level or quality of goods or services, if that

	difference is reasonably related to the value provided to us by your Personal Information.
Data Portability	You may request to receive a copy of your Personal Information, including specific pieces of Personal Information, including, where applicable, to obtain a copy of the Personal Information you provided to us in a portable format. In case you would like to receive the specific pieces please fill in this form to receive a copy of your data.

To learn more about your California privacy rights, please visit <https://oag.ca.gov/privacy/privacy-laws>.

(I) HOW CAN YOU EXERCISE THE RIGHTS?

Depending on the Services you are using, you may correct, access and delete Personal Information from using the setting on your Account or App as applicable. You may opt-out and unsubscribe from email marketing at any time. You can manage your tracking preference through your mobile device or browser settings.

Further, you may opt out of Sharing or Selling Personal Information by clicking [here](#).

Otherwise please submit a request to exercise your rights using the Data Subject Request Form available [here](#) and sending the form to dpo@lightricks.com.

The instructions for submitting, the general description of the process, verification requirements, when applicable, including any information the consumer or employee must provide are all as detailed in the Data Subject Request Form.

You may opt out through the “do not sell or share my personal information” button within our Cookies Setting tool available on our website. You may opt out through device settings (opt-out from tracking AAID, ADID, please see the following for information applicable to all devices: <https://thenai.org/opt-out/mobile-opt-out/>).

Further, you can opt-out from interest-based advertising, CCBA, by using Self-Regulatory Program for Online Behavioral Advertising such as:

Digital Advertising Alliance’s (“DAA”): <https://www.aboutads.info/choices> and <https://www.aboutads.info/appchoices>, and the Network Advertising Initiative (“NAI”): <https://www.networkadvertising.org/choices>.

Last, you can join Global Privacy Control (“GCP”) for opting out generally through your browser: <https://globalprivacycontrol.org/>. Our Consent Management Platform (“CMP”) will know to read all of these signals and ensure compliance with your request.

(J) NOTICE OF FINANCIAL INCENTIVE

We may, at times, offer you various financial incentives such as promo codes, discounts and special offers when you register to our newsletter by providing us with contact information and identifiers such as your name and email address. When you sign-up for our newsletter, email list or other discounts and special offers, you opt-in to a financial incentive. You may withdraw from a financial incentive at any time by opting out from our newsletter through the unsubscribe link within the email.

Generally, we do not assign monetary or other value to Personal Information, however, California law requires that we assign such value in the context of financial incentives. In such context, the value of the Personal Information is related to the estimated cost of providing the associated financial incentive(s) for which the information was collected. You can end program participation at any time by contacting us at dpo@lightricks.com to unsubscribe or cancel your participation in any special offer. We will not discriminate against you, in any manner prohibited by applicable law, for exercising these rights.

(K) AUTHORIZED AGENTS

You can designate an authorized agent to submit requests on your behalf. However, we will require written proof of the agent's permission to do so and verify your identity directly.

(L) RESPONSE TIMING AND FORMAT

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to an additional forty-five (45) days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

CONTACT US:

dpo@lightricks.com

By Mail:

Lightricks Ltd.

Professor Racah St, Building 5.4,

Jerusalem, Israel, 9190401

UPDATES:

This notice was last updated on February, 2024. As required under the CCPA, we will update our Privacy Policy **every 12** months, as and if needed. The last revision date will be reflected in the "Last Modified" heading at the top of this Privacy Policy.

PART III: OTHER RIGHTS APPLICABLE TO CLIFORNIA RESIDENTS

California Direct Marketing Requests: California Civil Code Section 1798.83 permits you, if you are a California resident, to request certain information regarding disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please use Data Subject Request Form available [here](#).

Do Not Track Settings: Cal. Bus. And Prof. Code Section 22575 also requires us to notify you how we deal with the “Do Not Track” settings in your browser. As of the effective date listed above, there is no commonly accepted response for Do Not Track signals initiated by browsers. Therefore, we do not respond to the Do Not Track settings. Do Not Track is a privacy preference you can set in your web browser to indicate that you do not want certain information about your web page visits tracked and collected across websites. For more details, including how to turn on Do Not Track, visit: www.donottrack.us.