



Privacy Policy

Last updated: 24.01.2023.

This is the privacy policy (the "**Policy**") of the website <https://noiahmarketingtechnology.com/> (the "**Site**") operated by Noiah Marketing Technology LTD. (the "**Company**", "**We**", "**Us**", "**Our**").

We are committed to securing Personal Data about you and your privacy. According to this commitment We will uphold the following principles:

- To be transparent in respect of the collection and processing of Personal Data about you:

It is important to Us that at all times you will have all of the information required in order for you to make educated decisions about the processing of Personal Data about you. For this purpose, We will make use of various techniques and measures aimed to provide you with relevant information about the processing of Personal Data about you, in the proper manner and timing.

The Policy is intended to provide you with the widest understanding of the types of Personal Data collected by Us and the manner in which We process it. It is therefore vital that you will review it at the first possible opportunity and from time to time.

In addition, where We find that you are required to be provided with specific information, We will provide it to you in the appropriate time and place.

We will also be happy to answer any question you have and provide you with any clarification you require, subject to legal limitations. For this purpose, you can approach Our data protection officer according to the following details:

Data Protection Officer, dpo@noiahmarketingtechnology.com.

- To process Personal Data about you solely for the purposes outlined in the Policy:

The purposes for which We can process Personal Data about you include, inter alia, allowing you to use our Site, to perform business and administrative activity that supports your use of the site, to provide you details of our services and products, and/or to uphold any legal and/or regulatory requirements. The entire list of the purposes for which We use Personal Data about natural persons is listed in section 7 of the Policy.

In addition, We may process Personal Data about you in order to understand your personal needs and preferences and provide you with personally tailored offers. You may request at any time that We will stop sending you personally tailored offers, and We will act according to such a request.

- To invest significant resources in order to respect your rights in connection with Personal Data about you:

We apply significant resources in order to allow you to exercise your rights as a data subject. Therefore, you may approach Us any time you wish to exercise any of your rights as a data subject (as further detailed in this Policy), and We will fulfill your wishes in accordance with applicable law.

- To secure Personal Data about you:

While We cannot promise absolute protection of the Personal Data about you, We can promise that We use and will continue to use a wide array of means and measures that are aimed ensuring that the Personal Data about you is secured.

Our Complete Policy

1. To What Does This Policy Apply?

This Policy describes what kind of Personal Data We collect, how do We collect it, use it, share it with third parties, secure it, process it etc.

In this Policy, any reference to "Personal Data" is to any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

In this Policy, wherever We refer to the "processing" of Personal Data, We refer to any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

You must be at least 18 years old (or such other age permissible by applicable law if higher than 18) to access and use the Site. We do not knowingly collect Personal Data about any person under the age of 18 (or such other age permissible by applicable law if higher than 18). la

2. Data Controller

The Company is the data controller in respect of the Personal Data about you.

3. Data Protection Officer

The data protection officer of the Company can be approached by sending an email to the following email address: Data Protection Officer, dpo@noiahmarketingtechnology.com.

4. When Do We Collect Personal Data About You?

We collect Personal Data about you whenever you use the Site, Our service channels and/or contact Us (whether via email, or otherwise). In some instances, you will actively provide Us with the Personal Data, and in other instances We will collect the Personal Data about you from examining and analyzing your use of the Site and/or Our service channels.

5. No Obligation to Provide Personal Data to Us and Its Implications

You are not obligated to provide Us with any Personal Data about you. However, if you do not provide Us with the means of communication to contact you, We will not be able to contact you and provide you with information concerning the Site and Our services. Providing Personal Data about you is a precondition to allow you to use the Site. Therefore, while you are not obligated to provide the Personal Data about you, if you will not provide Us with such Personal Data, you will not be able to use the Site.

6. What Personal Data About You Do We Collect?

Personal Data We collect upon each time you use the Site:

<https://noiahmarketingtechnology.com/>

Personal Data We receive from you: any Personal Data you provide to Us on your own free will when contacting Us, including via customer support, email, via the Site, or in any other manner, including your name, email, comments, feedback, complaints, requests or other content you submit to Us. We may record and/or document in writing your communications.

7. The Purposes of the Processing of Personal Data and Their Legal Basis

We process Personal Data about you for one or more of the purposes outlined in this section and according to the appropriate legal basis.

We shall not process Personal Data about you unless there is a legal basis for such processing. The legal bases according to which We may process Personal Data about you are as follows:

- a. **Your consent that We will process Personal Data about you for one or more specific purposes.** By way of example, for the purpose of sending you marketing materials.

Where the legal basis for the processing of the Personal Data about you is consent, you may at any time, withdraw your consent for the purposes for which you provided your consent by sending a notice free of charge to the following email address dpo@noiahmarketingtechnology.com.

Where you withdraw your consent for the processing of Personal Data about you, You might not be able to continue to use the Site, and you will have no claim in respect of that.

- b. **Processing is necessary for the purposes of the legitimate interests pursued by Us or by a third party.** By way of example, for the purpose of exercise or defense of legal claims.

Whenever the processing of Personal Data about you is necessary for the purpose of the legitimate interests pursued by Us or by a third party, the processing is conditional upon such interests not overridden by your interests or fundamental rights and freedoms which require protection of Personal Data about you. At any time, you may approach Us by sending a notice to the following email address dpo@noiahmarketingtechnology.com in order to receive information concerning the review performed by Us in order to reach the conclusion that We may process the Personal Data about you on account of such processing being necessary for the purposes of the legitimate interests pursued by Us or by a third party.

- c. **Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.** By way of example, for the use of the Site.

- d. **Processing is necessary for compliance with a legal obligation to which We are subject.**
By way of example, on account of legislation relating to the use of the Site.

The following list outlines the purposes for which We may process Personal Data about you and the legal basis for any such processing:

Purpose	Legal Basis
1 In order to allow you to use the Site Whenever you request to use the Site, We will process the Personal Data required for Us to perform such requests.	• Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.
2 In order to respond to your queries, requests and/or complaints, and to provide you with customer support services Processing of Personal Data about you is required in order to respond to queries you have, and in general to provide you with customer support services.	• Processing is necessary for the purpose of the legitimate interests pursued by Us or by a third party.
3 In order to provide you with tailor made marketing materials and offers In order to enhance and improve your use of the Site, We process Personal Data about you. For this purpose, We use Personal Data automated analysis techniques, including profiling.	• Processing is necessary for the purpose of the legitimate interests pursued by Us or by a third party.
4 In order to comply with any legal obligations or judicial or administrative orders	• Processing is necessary for compliance with a legal obligation to which We are subject.
5 In order to improve the Site We may use Personal Data about you in order to improve Site; such processing will include, inter	• Processing is necessary for the purpose of the legitimate

alia, an analysis of previous uses by you of the Site, any comments and complaints received in respect of the Site, as well as any errors and malfunctions.

interests pursued by Us or by a third party.

6 In order to send you marketing materials

- Your consent

Inasmuch as you agree to receive marketing materials from Us, We will send you, via the means of communication you consented to, marketing materials relating to the Site, and/or products and services of third parties.

It is hereby clarified that you may withdraw your consent at any time, by sending an email free of charge with the title “unsubscribe” to the following email address: dpo@noiahmarketingtechnology.com or by clicking the unsubscribe option in any marketing material sent to you. Please note that you will be requested to choose from which means of communication (one, some or all) do you wish to unsubscribe.

It is hereby clarified that unsubscribing will not cause the deletion of your contact details, but to cease receiving marketing materials – unless you re-request to receive them, subject to any legal obligation of Ours. Without derogating from the above, unsubscribing does not affect Our non-promotional communications with you, including those related to you’re use of the Site.

7 In order to analyze the effectiveness of any of Our marketing and advertising campaigns and activities.

- Processing is necessary for the purpose of the legitimate interests pursued by Us or by a third party.

8 In order to perform analysis, including statistical analysis

- Processing is necessary for the purpose of the legitimate

We use various analytical measures (including statistical ones) and conduct surveys in order to make decisions in various issues, including improving the Site.

interests pursued by Us or by a third party.

14 **In order to protect Our and third parties' interests, rights and assets, including initiation or exercise or defense of legal claims**

We may process Personal Data about you in order to protect the interests, rights and assets of Ours and of third parties, according to any law, regulation and agreement, including any of Our terms and conditions and policies.

- Processing is necessary for the purpose of the legitimate interests pursued by Us or by a third party.

8. Your Right to Object to the Processing of Personal Data About You Where Such Processing is Necessary for the Purpose of the Legitimate Interests Pursued by Us or by A Third Party

Where the processing of Personal Data about you is necessary for the purpose of the legitimate interests pursued by Us or by a third party, you have the right to object to such processing for this purpose by sending a notice to the following email address dpo@noiahmarketingtechnology.com, unless We demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

9. Your Right to Object to the Processing of Personal Data About You for Direct Marketing Purposes

We may provide you with offers that are tailored for you specifically, including products and services of third parties. This is done following the processing of Personal Data about you. For this purpose, We use Personal Data automated analysis techniques that provide Us with analysis and conclusions concerning you in various aspects, including profiling.

By way of example, such analysis and conclusions may be used by Us in order to offer you products and services which We think may be of more interest to you.

Similar analysis and conclusions are used to the extent that you agreed to receive marketing materials from Us, as such materials are tailored to offer you products and services which We think may be of more interest to you.

Where Personal Data about you is processed for direct marketing purposes, you shall have the right to object at any time to such processing for this purpose, including profiling to the extent that it is related to such direct marketing, by sending a notice to the following email address dpo@noiahmarketingtechnology.com, in which case We shall cease to process Personal Data about you for such direct marketing purposes.

In addition, you may withdraw your consent from receiving marketing materials at any time, by sending an email free of charge with the title "unsubscribe" to the following email address: dpo@noiahmarketingtechnology.com, or by clicking the unsubscribe option in any marketing material sent to you.

Please note that if you opt out of receiving marketing communications from Us, We may still communicate with you from time to time if We need to provide you with non-marketing information about the Site or for other legitimate non-marketing reasons.

10. Transfer of Personal Data to Third Parties

We share Personal Data with third parties that are associated with Us, for the purpose of supporting Our activities and the Site.

We may also share Personal Data about you with third parties that provide Us with the following services:

- a. Storage and hosting providers, including cloud computing services.
- b. Analysis of user experience.
- c. Support.
- d. Marketing.
- e. Dispatch of materials, including marketing materials, via various means of communications, such as emails, SMS, regular (snail) mail, push notifications and other electronic messages.
- f. CRM data management.
- g. Accounting and legal services.
- h. Research, analytical, technical and diagnostic services.
- i. Business partners.

We may share Personal Data about you with governmental, local, official, regulatory authorities, as well as where such disclosure is required to protect Our and third parties' interests, rights and assets, including initiation or exercise or defense of legal claims.

In addition, We may disclose Personal Data about you to potential purchasers of investors in, or lenders to, Us and/or any third party that is associated with Us, or in the event of any similar transaction (including, but not limited to, the sale of some or all of Our assets and/or some or all of the assets of any third party that is associated with Us), and/or in connection with any merger,

reorganization, consolidation or bankruptcy of Ours and/or any third party that is associated with Us.

In addition, We may share Personal Data about you with other third parties with your consent.

Without limiting the foregoing, We may, at our sole and absolute discretion, share aggregated information which does not identify you or de-identified information about you with other parties or affiliates for any purpose except as prohibited by applicable law.

11. Links to Websites and/or Applications of Third Parties

The Site may provide links to websites and/or applications of third parties. We do not control such websites and applications, nor the collection and/or processing of Personal Data about you by such websites and applications, and We are not responsible for such websites and/or applications, nor to their privacy and data protection policies and activities. This Policy does not apply to any actions taken via such websites and/or applications.

Wherever you access such third parties' websites and/or applications, We recommend that you carefully review their privacy policies prior to using such websites and/or applications and prior to disclosing any Personal Data by you.

12. Cookies

General

When you visit or access the Site and/or use Our products and services, a cookie file (which is a small text file) is installed on the device via which you visit or access the Site and/or use Our products and services. The cookies allow Us to collect information about you and your behavior, in order to improve your user experience, to remember your preferences and settings, to customize and offer you with products and services that may interest you. Cookies are also used to collect statistics about your usage of Our products and services and perform analytics.

Some of the cookies We use are session cookies, which are downloaded temporarily to your device and last until you close your web browser, while others are persistent cookies which last on your device after you cease browsing the Site and are used to help the Site remember you as a returning visitor when you return to the Site.

Types of cookies

The cookies We use have been classified according to their functionality, as follows:

Type of cookie	Purpose	Additional Information
Strictly Necessary Cookies	<p>These cookies are strictly necessary to enable you to navigate the Site and use features you have requested. They are used to provide you with Our content, products and services that you have requested.</p> <p>Such cookies are essential to help your device download or stream information so that you can navigate around the Site, use its features and allow you to return to pages you have previously visited.</p>	<p>These cookies collect Personal Data about you.</p> <p>These cookies are deleted when you close your web browser (session cookies)</p>
Functionality Cookies	<p>These cookies are used to recognize you when you return to the Site and allow Us to remember your choices and preferences in order to allow Us to provide you with improved and customized features.</p>	<p>These cookies collect Personal Data about you, such as your language preference and marketing preferences.</p> <p>These cookies survive the closing of your web browser, and last until their applicable expiry time.</p>
Performance Cookies	<p>These cookies are used to provide aggregated statistics in respect of the performance of the Site and to test and improve such performance, in order to provide better user experience; in addition, they allow Us to carry out analytical functions on the Site.</p>	<p>These cookies collect anonymised data which is not relating to an identified or identifiable natural person.</p> <p>These cookies are valid for varying periods; some are deleted once you close your browser, while others have an indefinite validity period.</p>
Third Party Marketing / Targeting Cookies	<p>These cookies are used to deliver ads and marketing communications, and to make the Site displayed, in a manner which is more relevant to you, based on your interests and actions; they are also used to measure the effectiveness of an advertising campaign. These cookies record your visit to the Site, the pages</p>	<p>Some of these cookies are provided and used by third parties.</p> <p>These cookies are valid for varying periods; some are deleted once you close your browser, while others have an indefinite validity period.</p>

you have visited and the products and services you used.

Blocking and removal of cookies

You can change your browser settings in order to block and delete some or all cookies. Please see below links to instructions as to how to do this in respect of some of the most popular web browsers:

- [Firefox](#)
- [Internet Explorer](#)
- [Google Chrome](#)
- [Safari](#)

Please note, however, that if you do so, some or all of the Site's features and functionalities might not perform as intended.

13. Your Rights in Respect of Personal Data About You

You are entitled to the following rights in respect of Personal Data about you. The exercise of such rights will be via sending an email requesting to exercise your right to the following email address: [ENTER EMAIL]

Right of access

You have the right to receive from Us confirmation as to whether or not Personal Data about you is being processed, and, where that is the case, access to the Personal Data and the following information: (1) the purposes of the processing; (2) the categories of Personal Data concerned; (3) the recipients or categories of recipients to whom the Personal Data has been or will be disclosed, in particular, if you are in the European Union, recipients in third countries outside the European Economic Area (EEA) or international organizations; (4) where possible, the envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period; (5) the existence of the right to request from Us rectification or erasure of Personal Data or restriction of processing of Personal Data about you or to object to such processing; (6) if you are in the European Union - the right to lodge a complaint with a supervisory authority; (7) where the Personal Data is not collected from you, any available information as to its source; (8) the existence of profiling; and (9) if you are in the European Union - where Personal Data is transferred to a third country outside the EEA or to an international organization, the appropriate safeguards relating to the transfer.

We shall provide a copy of the Personal Data undergoing processing and may charge a reasonable fee for any further copies requested by you. Where you make the request by electronic means, and

unless otherwise requested by you, the information shall be provided in a commonly used electronic form.

The right to obtain a copy of the Personal Data shall not adversely affect the rights and freedoms of others, and therefore if the request will harm the rights and freedoms of others, We may not fulfill your request or do so in a limited manner.

Right to rectification

You have the right to obtain from Us the rectification of inaccurate Personal Data about you. Taking into account the purposes of the processing, you have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.

Right to erasure

You have the right to obtain from Us the erasure of Personal Data about you where one of the following grounds applies: (a) the Personal Data is no longer necessary in relation to the purpose for which it was collected or otherwise processed; (b) you withdraw your consent on which the processing is based and there is no other legal ground for the processing; (c) you object at any time, on grounds relating to your particular situation, to processing of Personal Data about you which is based on the legitimate interests pursued by Us or by a third party, and there are no overriding legitimate grounds for the processing; (d) you object to the processing of Personal Data about you for direct marketing purposes; (e) the Personal Data has been unlawfully processed; (f) the Personal Data about you has to be erased for compliance with a legal obligation in European Union or Member State law to which We are subject.

This right is not applicable to the extent that the processing is necessary: (a) for compliance with a legal obligation which requires processing by law to which We are subject; or (b) for the establishment, exercise or defense of legal claims.

Right of restriction of processing

You have the right to obtain from Us the restriction of processing of Personal Data about you where one of the following applies: (a) the accuracy of the Personal Data is contested by you, for a period enabling Us to verify the accuracy of the Personal Data about you; (b) the processing is unlawful and you oppose the erasure of the Personal Data about you and request the restriction of its use instead; (c) We no longer need the Personal Data about you for the purposes of the processing, but it is required by you for the establishment, exercise or defense of legal claims; (d) where the processing of Personal Data about you is necessary for the purpose of the legitimate interests pursued by Us or by a third party, unless We demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims; (e) where Personal Data about you is processed for direct marketing purposes, including profiling the extent that it is related to such direct marketing.

Where processing of Personal Data about you has been restricted following your request, such Personal Data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.

Right to data portability

You have the right to receive the Personal Data about you, which you have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit such Personal Data to another controller, where: (a) the processing is based on your consent or on a contract to which you are a party; and (b) the processing is carried out by automated means.

In exercising your right to data portability, you have the right to have the Personal Data about you transmitted directly from Us to another controller, where technically feasible. The exercise of your right to data portability is without prejudice to your and Our rights under your right to erasure. In addition, the right to data portability shall not adversely affect the rights and freedoms of others.

Right to object

You have the right to object, on grounds relating to your particular situation, at any time to processing of Personal Data about you which is based on the legitimate interests pursued by Us or by a third party, including profiling based on such legitimate interests. We shall no longer process the Personal Data about you unless We demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

Right to withdraw consent

You may withdraw your consent provided to Us for the purpose of processing Personal Data about you at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

Right to lodge a complaint with a supervisory authority

If you are in the European Union, you have the right to lodge a complaint with a supervisory authority which is established by a Member State in order to protect the fundamental rights and freedoms of natural persons in relation to processing of personal data within the European Union.

Your rights in respect of Personal Data about you as outlined in this section 13 may be restricted by European Union or Member State law to which We are subject.

We shall provide you with the information requested according to your rights outlined in this section 13 without undue delay and in any event within 1 (one) month of receipt of the request. That period may be extended by 2 (two) further months where necessary, taking into account the

complexity and number of the requests. We shall inform you of any such extension within 1 (one) month of receipt of the request, together with the reasons for the delay.

The information requested according to your rights outlined in this section 13 shall be provided free of charge, unless stated otherwise in this section 13. Where requests are manifestly unfounded or excessive, in particular because of their repetitive character, We may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or (b) refuse to act on the request.

We may require you to provide additional information necessary to confirm your identity in order to fulfill your request according to your rights outlined in this section 13, where We have reasonable doubts concerning the identity of the natural person making the request.

14. Retention of Personal Data About You

We shall retain Personal Data about you for as long as is required to fulfill the purposes of the processing of the Personal Data as outlined in this Policy, or for a longer period as required according to the legislation, regulation, policies and orders that apply to Us.

In general, We will hold Personal Data about you for a minimum period of 5 (five) years after you withdraw your consent to receive marketing and promotional materials from Us.

In order to ensure that Personal Data about you is not retained for longer than is required, We periodically review Personal Data retained by Us in order to examine whether any Personal Data can be erased.

15. Transfers of Personal Data to A Third Country or An International Organization

If you are in the European Union, Data about you may be transferred to a third country (i.e., jurisdictions outside the EU Member States, Iceland, Norway and Liechtenstein) or to international organizations. In such circumstances, We shall take appropriate safeguards aimed to ensure the protection of Personal Data about you and provide that enforceable data subject rights and effective legal remedies for data subjects are available.

You may request Us to be provided with details concerning the safeguards employed by Us to protect the Personal Data about you which is transferred to a third country or an international organization, by sending an email to the following address: dpo@noiahmarketingtechnology.com.

16. Protection of Personal Data About You

We implement appropriate technical and organizational measures to ensure an appropriate level of security to Personal Data taking into account the risks that are presented by processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data transmitted, stored or otherwise processed.

We may be required, due to legal or other obligations outside Our control, to transfer Personal Data about you to third parties, such as public authorities. In such circumstances, We have limited control over the level of protection provided to the Personal Data about you by such third parties.

Any transfer of Personal Data via the internet cannot be fully secured. Therefore, We cannot ensure the protection of Personal Data about you when transferred via the internet to the Site.

17. Changes to This Policy

We may amend, from time to time, the terms of this Policy. Whenever We amend this Policy, We will notify such amendments by publishing the updated Policy on the Site. In addition, when We make significant amendments of this Policy, We will strive to inform you about such amendments via means of communication which We believe are reasonably appropriate to inform you of such amendments and by publishing a notice about such amendments on the Site. Unless stated otherwise, all amendments will enter into force upon publishing the updated Policy on the Site.