

AKOLOGIC PRIVACY POLICY

Introduction

We at AKOLogic Solutions Ltd., honor and respect your privacy and are committed to safeguarding your Personal Data, and accordingly, we have created this Privacy Policy.

This policy will explain how and why we gather, store, share, and use Personal Data.

Creating an account with us for the Service and/or the use thereof means that you have read and agreed to this privacy policy. If you do not agree to this Privacy Policy, you have the right not to activate or to disable certain features of the Service (with the following caveats) or to delete your account in the Service.

Unless they have been otherwise defined here, Capitalized terms and expressions in this Privacy Policy will have the same meaning as ascribed to them in our Terms of Use at <https://www.AKOLogic.info> ("**Terms of Use**"). The terms governing your use of the Service are defined in our Terms of Use. This Privacy Policy is an inseparable part of the Terms of Use.

1. YOU ARE NOT OBLIGATED TO SUPPLY US WITH INFORMATION

1.1 According to law, you have no obligation to supply us with information and the providing of information is dependent on your goodwill and your agreement, but without the information, it will not be possible to receive some or all of the Services.

1.2 The General Data Protection Regulation or "GDPR" gives certain rights to individuals concerning their Personal Data. As available and except as limited under applicable law, the rights afforded to individuals are, as relevant to our Service:

- Right of access - the right to be informed of, and request access to, the Personal Data we process about you;
- Right to rectification - the right to request that we amend or update your Personal Data where it is inaccurate or incomplete;
- Right to erasure - the right to request that we delete your Personal Data;
- Right to restrict - the right to request that we temporarily or permanently stop processing all or some of your Personal Data;
- Right to object, at any time, to us processing your Personal Data on grounds relating to your particular situation; and
- Right to data portability - the right to request a copy of your Personal Data in electronic format and the right to transmit that Personal Data for use in another service.

To exercise these rights, please contact our Privacy Officer: ron@akol.co.il

2. WHAT INFORMATION WE COLLECT AND HOW WE COLLECT IT

we collect the following information in the following ways:

2.1 Personal Data during sign up to the Service –

The Personal Data that is provided by you or collected by us to enable you to sign up for and use the Service. Your bank account details for direct debit set-up, also potentially credit or debit card type, expiration date, and certain digits of your card number. Also, this may include your username, email address, phone number, birth date, gender, street address, and country. The exact Personal Data we will collect may vary with the type of Service modules you sign up for.

2.2 Personal Data collected through your use of the Service –

- 2.2.1 Information about the type of Service modules included in the Service.
- 2.2.2 Personal Data in any user content you upload to the Service, including with our customer service team.
- 2.2.3 The details of your use of third party applications that interoperate with the Service.
- 2.2.4 Certain technical data, which may include URL information; online identifiers including cookie data and IP addresses; information about the types of devices you are using such as unique device IDs, network connection type (e.g. wifi, 3G, LTE, Bluetooth), provider, network and device performance, browser type, language, operating system and crash reports.

2.3 Personal Data that you choose to give us that enables us to provide you with additional features/functionality -

We strive to reach alliances with various certification and standardization bodies (such as GLOBALG.A.P, MPS, and potentially others)("Certifying Bodies") who strive to create a standard for good agricultural practice in the global agricultural and food retail sector, via a network of cooperation partners. AKOLogic is one of those cooperation partners.

If you opted for the certification/standardization module, then you will be asked to provide to the relevant Certifying Body, via the Service, additional Personal Data regarding yourself, your permitted users, your relevant staff and employees, your service providers, and possibly other business partners of yours. Such information may include the following Personal Data in an identifiable form:

Driver's license details and scanned copies
National ID details and scanned copies
National passport details and scanned copies
Professional training and other certifications and scanned copies
Details of mechanical and engineering equipment and scanned copies of licenses thereof
Staff and employees attendance logs and salary data

It is your responsibility to receive the required consents from any third-party data subjects before providing us with their Personal Data.

In such instances, we will ensure that the transfer of such Personal Data is carried out under applicable privacy laws.

2.4 Data collected from third party sources –

- 2.4.1 We work with technical service partners that provide us with certain data, such as mapping IP addresses to non-precise location data (e.g., city, state), to enable us to provide the Service.

- 2.4.2 We may receive data from our payment partners to enable us to send you invoices, process your payment, and provide you with the Services you have purchased.
- 2.4.3 Depending on the modules you opted for, we may collect data from your systems as well as from third-party programs that operate on your systems, to collect data, mostly regarding irrigation, use of pesticides (composition, concentration, dosage), fertilizers (composition, concentration), geographical data systems, water, and energy sources and uses, and accounting data, to enable us to provide you with the Services you have purchased relative to the modules you opted for. Some of that data collected this way is Personal Data, as the accounting data collected includes data concerning employees and service providers (salaries/payments, hours worked, and like information typically available on accounting and salary payment systems).

3. HOW WE USE INFORMATION

Here is why we collect and process Personal Data:

- 3.1 To provide you with the Service.
 - 3.2 To provide you with support services, to assist you with your requests, and to communicate with you concerning the Services.
 - 3.3 To diagnose and fix issues with the Service.
 - 3.4 To process your payment.
 - 3.5 To evaluate and develop new features, technologies, and improvements to the Service.
 - 3.6 For marketing purposes.
 - 3.7 To comply with legal obligations and law enforcement requests.
 - 3.8 To fulfill contractual obligations with third parties, for example, agreements with Certifying Bodies.
 - 3.9 To take appropriate action concerning reports of intellectual property infringement or inappropriate content.
 - 3.10 To establish, exercise, or defend legal claims.
 - 3.11 To establish and conduct business plans, reports, and forecasts.
 - 3.12 To detect fraudulent behavior.
 - 3.13 To conduct research and surveys.
- We may use statistical and anonymous data, in a pseudonymized format, as collected from users of the Service, in any way we deem fit in our absolute and sole discretion.

4. WHO WE SHARE PERSONAL DATA WITH, AND FOR WHAT PURPOSES

Information we may share:

- 4.1 If you opted for the certification/standardization module, as outlined in Section 2.3, then sharing particular Personal Data with the relevant Certifying Body is required for the proper operation of such a module. If you selected this module, we will provide to the relevant Certifying Body, in an identifiable form, Personal Data you uploaded to the Service regarding yourself, your permitted users, your relevant staff and employees, your service providers, and possibly other business partners of yours. If you selected this module, you grant us explicit permission to share the Personal Data with Certifying Bodies.

- 4.2 If you use third-party programs that interoperate with the Service, you acknowledge that AKOLogic may allow the providers of such third-party programs to access such information as required for the interoperation and support of such third party programs.
- 4.3 We provide access to information including Personal Data to our employees, who operate under a comprehensive obligation of confidentiality.
- 4.4 We work with service providers which may need access to certain Personal Data to provide their services to us. These service providers may include those hired to provide customer service, customer support, operate the technical infrastructure required to provide the Service, provide email and server storage services, assist in protecting and securing our systems and services, provide statistical services, cooperate with us for purposes of research and enhancement of the Service, and help market our products and services as well as partner products and services.
- 4.5 We will share your Personal Data with our payment processors as necessary to enable them to process your payments, and for anti-fraud purposes.
- 4.6 We will share your Personal Data for activities such as statistical analysis and academic study but only in a pseudonymized format.
- 4.7 We will share your Personal Data with other AKOLogic group companies to carry out our daily business operations and to enable us to maintain and provide the Service to you.
- 4.8 We share your Personal Data when we in good faith believe it is necessary for us to do so to comply with a legal obligation under applicable law, or respond to valid legal process. We also share your Personal Data where we in good faith believe that it is necessary for our own, or a third party's legitimate interest relating to national security, law enforcement, litigation, a criminal investigation, protecting the safety of any person, or to prevent death or imminent bodily harm.
- 4.9 We will share your Personal Data in those cases where we sell or negotiate to sell our business to a buyer or prospective buyer. In this situation, we will continue to ensure the confidentiality of your Personal Data and give you notice before your Personal Data becomes subject to a different privacy policy.

5. ALTERATION OR DELETION OF PERSONAL DATA

- 5.1 We will delete the stored Personal Data about you without any action on your part if there is no longer a need for the information to be known to perform the purpose associated with the storage or if the storage of the data is not permitted for other legal reasons. In some cases provided for by law (e.g., statutory retention obligations), your data may be blocked instead of deleted.
- 5.2 If you request, we will delete or anonymize your Personal Data so that it no longer identifies you, unless we are legally allowed or required to maintain certain Personal Data, including situations such as the following:
 - If there is an unresolved issue relating to your account, such as an outstanding debt on your account or an unresolved dispute, we will retain the necessary Personal Data until the issue is resolved.

- Where we need to retain the Personal Data for our legal, tax, audit, and accounting obligations, we will retain the necessary Personal Data for the period required by applicable law.
- Where necessary for our legitimate business interests such as fraud prevention.

5.3 Please note that If you choose to delete or anonymize some of your Personal Data, you will not be able to use some or all of the Service features.

5.4 Should you choose to alter or delete your information please refer to our Privacy Officer here: ron@akol.co.il

6. WHAT ARE COOKIES AND HOW WE USE THEM

6.1 Cookies and similar technologies are computerized files which are downloaded to your device when you visit a website. Cookies allow a website to recognize a user's device, and they allow for optimal user experience, by allowing, for example, efficient navigation between pages and recalling user preferences.

6.2 There are a few types of cookies. The main types are Session Cookies and Persistent Cookies. Session Cookies – These cookies expire once the web browser is closed. Persistent Cookies - These cookies stay on the device for a set period or until they are deleted by the user.

6.3 Cookies can be of a first-party or a third-party. In the instance of the services, first-party cookies are cookies we (ourselves or by a third party at our request) when you are visiting the AKOLogic website ("Website"). Third-party cookies are cookies that are set through the Website, by a party other than us.

6.4 Different cookies are used for different purposes:

6.4.1 Strictly necessary cookies are cookies that must be present for the Service to provide the basic functions of the Service. They are essential to be able to access features of the Service and could include signing in, e-billing, and user navigating back and forth between pages without losing previous actions from the same session. We use these cookies to allow us to operate the Service as you have requested.

6.4.2 Performance cookies are cookies used specifically to gather statistical data on how a website is performing, on how visitors use the website, which pages of the website are visited most often, or if users get error messages on the web pages. These cookies monitor only the performance of the site as the user interacts with it. These cookies don't collect identifiable information on users, and all the data collected is anonymous and we only use it to continually improve the functionality of the Website and the Service.

6.4.3 Functionality cookies allow websites to remember the user's site preferences and choices they make on the site including username, region, and language. This allows the website to operate the Service according to the user's preferences. These cookies remember choices a user makes to improve his experience. They are anonymous and don't track browsing activity across other websites. We use functionality cookies to provide you the Services you request while remembering your preferences to boost your user experience and provide you with enhanced, more personal features, on the Website.

6.4.4 Third-Party cookies - We may allow our business partners to use cookies or other similar technologies on or outside the Service for the same purposes identified above, including collecting information about your online activities over time and across different websites, applications, and/or devices.

6.5 How you can manage your cookie preferences:

6.5.1 Browser Cookies - you can withdraw or modify your consent to our use of cookies at any time. You can use your web browser settings to accept, refuse, and delete cookies. To do this, follow the instructions provided by your browser.

Please take note that deleting or disabling cookies may have an adverse effect on your user experience on the Service.

6.5.2 Mobile Identifiers - on your mobile device, your operating system may provide you with additional options to change or reset your mobile identifiers.

7. SECURITY

7.1 We take information security very seriously. We keep the information on a database registered in Israel under the Protection of Privacy Law, 5741-1981, with registration number 700062188 and it is protected and secured at all times by taking the necessary means for protection as required by law. We implement appropriate technical and organizational measures to help protect the security of your Personal Data; however, please note that no system is ever completely secure.

7.2 Your password protects your user account. You are strongly encouraged to use a strong password, unique to your account, never share your password with others, limit access to your computer and browser, and log out after having used the Service.

8. CHANGES TO THE PRIVACY POLICY

We reserve the right to change from time to time the terms and conditions of this Policy, and the most updated version will appear on the Service under the tab "Privacy Policy". If the changes materially affect your rights or your obligations, we will notify you about them in advance using an email message or via the Service, and your continued use of the Service after such changes have come into effect will constitute acceptance of, and agreement to be bound by, those changes.

9. SECURITY EVENTS

We report information security events to the competent authority and act according to its instructions.

10. CONTACTING OUR PRIVACY OFFICER

We respect your privacy and honor the law, so we have appointed a Privacy Officer with whom you can make contact by email (ron@akol.co.il) in any case in which you believe that your privacy has been compromised by any person in the course of using the Service.

Our privacy officer will receive your complaints and will investigate them.

If you have any questions about your privacy, your rights, or how to exercise them, please contact our Privacy Officer at ron@akol.co.il. If you have concerns about our processing of your Personal Data, please continue to work with us to resolve them. However, you can also contact and have the right to file a complaint with the Israeli Privacy Protection Authority or with your local Data Protection Authority.