

Data Protection (Privacy) Policy  
and  
Cookies Policy



Legal advisory by



July 2019

## **Creditplace Personal Data Protection Policy and Cookies Policy**

This Data Protection Policy (hereinafter, “Policy”) applies to all activities of Creditplace Ltd. (hereinafter, “Creditplace” or “we”) with respect to the protection of personal data that Creditplace collects, processes and stores in the course of its business activities, including through its website (“website”), as well as any other electronic interfaces with data subjects.

Creditplace is a private corporation registered in Israel with its head offices located at 3 Arie Shenkar St., Herzliya, Tel Aviv 46120, Israel. For any questions regarding the collection, processing or use of personal data relating to you (as explained below) please contact us via at: [info@Creditplace.com](mailto:info@Creditplace.com).

The language of this Policy is intended to be gender-neutral.

### **1. General principles**

- 1.1 We at Creditplace believe that it is important to protect your data privacy. This Policy explains your rights regarding the personal data we collect, process and use in our ongoing business operations, including via the website, as well as our use of safeguards to protect these rights. The Policy also applies to Creditplace’s use of cookies and tracking on the website interfaces, as specified in the Cookies Policy below.
- 1.2 Your personal data is collected and stored lawfully, fairly and transparently by Creditplace. In processing your data, we act in good faith, in a proportionate manner, and with the appropriate technical and organizational measures; and to mitigate the risks represented by the processing of the data.
- 1.3 Please be aware that the collection, processing and use of your personal data may be carried out by external data processors on our behalf in the course of Creditplace’s ongoing business and our supply of services to you. Within the framework of our contracts with such external processors, we inform them of the requirement to duly comply with relevant legal data protection rules and legislation applicable to the services they provide to us.
- 1.4 We may revise this Policy from time to time, and such changes shall come into effect from the moment we notify you of such changes and/or updates, either on the website or in some other reasonable manner.
- 1.5 For data subjects of the European Union, your rights under the General Data Protection Regulation (GDPR) are safeguarded by Creditplace in accordance with the principles detailed below. Any questions regarding GDPR-related rights may be referred to us via the email address: [info@creditplace.com](mailto:info@creditplace.com) .

## 2. Data Subject Rights

**Subject to the applicable law that determines your status as a data subject and the jurisdiction in which you are located, you may have some or all of the following rights in respect of your personal data that we process:**

- 2.1 **Consent:** For data subjects for which processing by explicit consent is relevant, we will only process personal data if you have consented to such processing, unless we are otherwise legally authorized or obliged to collect and further process personal data relating to you; and data will be processed solely based on your informed consent, used only for the purposes stated in the consent procedure (for example, in order to send Creditplace newsletters and the like), and within the scope outlined below.
- 2.2 **Withdrawal of consent** - You may revoke or withdraw your consent at any time by notifying us directly via the email address [info@creditplace.com](mailto:info@creditplace.com). Upon receipt of your request, and subject to applicable laws, we will delete your data unless we are legally obliged or authorized to retain it and your consent to its processing, including for ongoing legitimate business interests of Creditplace. Withdrawal of your consent shall not have any influence over the legality of processing of your personal data carried out prior to said withdrawal.
- 2.3 **Minimization of data processing** - We process and store a minimum of your personal data, only as needed for providing our services to you.
- 2.4 **The “right to be forgotten”** - Subject to any relevant laws, including tax laws, you may also request the erasure of all or part of your personal data held by Creditplace. Upon receiving your request via the email address [info@creditplace.com](mailto:info@creditplace.com), we will remove your personal data from all of our records, as soon as reasonably possible and when technically feasible, unless there is an overriding legal interest or other legal basis for the continuation of the data processing. Please understand that in the event of deletion of personal data upon your request, Creditplace may not be able to further provide services via the website and other interfaces, in whole or in part. In requesting data deletion, you irrevocably agree and waive any claim against Creditplace’s inability to provide said services, or any interruption or malfunction resulting therefrom. Note that your request for deletion may also be rejected by Creditplace due to a lack of sufficient relevant information provided by you.
- 2.5 **The “right to data correction”** - You may also request the correction of all or part of your personal data held by Creditplace. Upon receiving your request via the email address [info@creditplace.com](mailto:info@creditplace.com), we will correct your personal data, as soon as reasonably possible and when technically feasible, unless there is an overriding legal interest or other legal basis for the continuation of the data processing. In requesting data correction, you irrevocably agree and waive any claim against Creditplace’s inability to provide said services, or any interruption or malfunction resulting therefrom. Note that your request for correction may also be rejected by Creditplace for lack of sufficient and/or relevant information provided by you.

- 2.6 *Transparency and portability of personal data*** - You are entitled to ask Creditplace for information about the type of personal data about you that we process. You may also be entitled to obtain it in a commonly-used and machine-readable form, subject to technical feasibility and lawfulness considerations. Please forward your request via the email address [info@creditplace.com](mailto:info@creditplace.com).
- 2.7 *Automated decision-making on the basis of your personal data*** – Although the situation will be rare, we may make decisions concerning our business relationship with you based on automated processing operations without human intervention. We commit to giving you the opportunity to obtain human intervention in such a decision, express your point of view, and obtain an explanation of the decision. Please send your request regarding automated decision-making via the email address [info@creditplace.com](mailto:info@creditplace.com).
- 2.8 *Personal data relating to children and minors*** – We do not knowingly collect or process personal data relating to children and minors under the age of 16 years, unless we are legally obliged to do so. If we become aware that personal data was transferred to us or collected by us relating to children and minors under the age of 16 years without the informed consent of a parent or legal guardian, we will delete such personal data without undue delay on our own initiative. Please forward any requests in this respect via the email address [info@creditplace.com](mailto:info@creditplace.com).
- 2.9 *In the implementation of these data protection rights***, Creditplace is committed to providing a timely and transparent response to your requests. For any questions regarding these rights, please contact us via the email address [info@Creditplace.com](mailto:info@Creditplace.com).

### **3. Why Creditplace uses your personal data**

- 3.1** Creditplace uses your personal data to provide the services requested by you and to process your requests and inquiries.
- 3.2** Your personal data is also used for the cookies and tracking utilized in the websites and apps to distinguish you from other users, to improve your use of these interfaces, and to ensure that content in the website and other relevant interfaces is presented in the most effective manner for you.
- 3.3** Additional information about our use of cookies and tracking may be found in our Cookies Policy below.

### **4. The types of personal data we collect and how we use it**

- 4.1** The personal data collected and used by Creditplace is limited strictly to the data necessary for us to provide you with services we supply in the course of our ongoing business services, while operating under the relevant data protection and other

regulatory obligations. Access to your data, including physical access, is limited to only those employees of Creditplace and third parties who have contracted with us and who utilize it exclusively for the purposes outlined below.

- 4.2 There may be rare circumstances in which we process sensitive personal information, in order to provide you with services in our current area of business. In such a case, we will only use this information for these purposes and will delete it when the purpose for which the information was collected or processed is terminated, unless there is a legal obligation not to delete this information
- 4.3 The data collected and processed is both general in nature, (for example, for technical purposes) and, depending on the services you select and utilize, personal data such as your name, contact details, some identifying numbers, the name of your internet provider, your IP address, browser type and system software, as well as the websites you have visited before being transferred to the Creditplace website, including keywords used for searches and the sites from which you have been transferred (e.g., search engine or linked content).
- 4.4 There may be rare circumstances in which automatic processing of your personal data may occur. As is true of most organizations operating websites, we gather certain information automatically and store it in log files. This information includes but is not limited to IP addresses, type of browser, Internet service provider, referring and exit pages, operating systems, a date/time stamp and clickstream data. We may use this information to analyze trends, to administer the website, to track users' movements through them and to gather information about our user base as a whole. We may link this automatically-collected data to personal data for legitimate business purposes, such as to detect and prevent fraudulent activity; and other legally-authorized purposes.
- 4.5 When you receive services from Creditplace through the website and other electronic interfaces, you may also be directed to third-party processors. When we use such third-party processors, we rely on the third-party service provider to process personal data in order to provide certain services; and we contractually require them to comply with the data protection and other laws and regulations applicable to their processing services. Please check the respective service provider's relevant data protection terms and compliance with applicable laws prior to usage of any such processor's services. The same applies to any links to and from websites of third-party networks, advertisers and affiliates. Such third-party websites are governed solely by such third parties' data protection policies: you are advised to be careful and check any such third party's privacy policies and compliance with laws, prior to supplying them with any of your personal data to them.
- 4.6 Please note that Creditplace may also disclose your data to a third party if we are required to do so by applicable law, court order or governmental regulation; or if such disclosure is otherwise authorized and necessary in support of any criminal or legal investigation or proceeding in accordance with applicable laws and regulations.

- 4.7 Creditplace may need to transfer the data submitted by you for the purposes described above to third parties in locations outside the country in which you are physically located, potentially including countries which may not require an adequate level of protection for your personal data compared with that provided in your country. By accepting this Policy, you consent to such data transfer as described in this section.

## **5. Creditplace's protection of your personal data**

- 5.1 We have taken all reasonable, industry-standard technical and organizational measures to protect your personal data against loss, alteration, theft or access by unauthorized third parties.
- 5.2 We will not sell, share, transfer or use the data we collect from you for purposes other than those purposes stated expressly in this Policy.
- 5.3 We will delete your personal data where the business purpose for which the data was being collected or processed ceases to apply, or if applicable data protection rules require us to delete such personal data.
- 5.4 The above notwithstanding, Creditplace will not be liable or responsible in any way, including financially, for any damage or loss resulting from the improper use or any breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, your personal data.

## **Cookies Policy**

6.1 This Cookies Policy applies to all activities of Creditplace with respect to the cookies that we collect and store in the course of our business activities, including through the website and other electronic interfaces with data subjects that we operate.

6.2 **Important note:** Use of the Creditplace websites by you indicates your acceptance of this Cookies Policy.

6.3 **What's a cookie?** A cookie is a small file sent from a website, which is then stored by your web browser. The information in the cookie can be used to recognize your last session with Creditplace. Cookies cannot install malicious software such as viruses on your device, and they do not store any of your personal data or account information.

6.4 **Why do we use cookies?** We use cookies to save and maintain Creditplace users' settings and selected preferences during browsing sessions, for saving repeating users' preferences for future use (e.g. geographical location, accessibility and language selections and preferences), and for statistical analysis of the performance of websites and apps, trend analysis, and monitoring and identifying errors.

**6.5 Where do cookies come from?** Cookies originate from two types of sources: *1<sup>st</sup>-party* and *3<sup>rd</sup>-party*. This classification refers to the internet domain that is placing the cookie.

6.5.1 *3<sup>rd</sup>-party cookies* are cookies that are set by a domain other than that of the site being visited by the user. If a user visits a website and another entity sets a cookie through that site this would be a *3<sup>rd</sup>-party* cookie.

6.5.2 *1<sup>st</sup>-party cookies* are those set by a website that is being visited by the user at the time.

**6.6 Opting in** - When you first visit the websites and apps, you will be given the option to accept or decline the use of cookies. You can also control the use of cookies at the individual browser level, and instructions for managing cookie usage can be found for the following browsers, at:

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

**6.7 If you do not opt in** to cookies, you may still use the websites, but your ability to use some features may be limited or unavailable. Many browsers allow a private mode to be activated through which the cookies are always erased after the visit, and you hereby irrevocably and unconditionally waive any claim or demand in this regard. If you wish to opt out of interest-based advertising, click <<http://preferences-mgr.truste.com/>>. If you are located in the European Union click <<http://www.youronlinechoices.eu/>>.

**6.8 Do Not Track/Privacy Mode** is a function that allows users to opt out from being tracked by websites for any purpose including the use of analytics services, advertising networks and social platforms.

**6.9 If you have enabled the “do not track” function** in your browser, you will not be tracked. This is in addition to you opting-out of the aggregation and analysis of data for the website and app statistics.

**6.10 Categories of cookies we use** – Creditplace places a high priority on the security and confidentiality of the information stored in the persistent cookies we use. The categories we use are as follows:

- **Performance cookies** – These cookies allow publishers to track your behavior as a site visitor, measure site performance, and improve your user experience.

- **Functionality cookies** - There are different types of cookies in this category, and they are used to customize the site for your personal use using the options you specify, such as your language preference.
- **Targeting cookies** - These cookies help you track relevant ads for you. They help record your use of these ads, including limits on how often you view them.

6.11 *Any questions?* For any questions about the use of cookies by Creditplace, please be in touch with us via the email address [info@creditplace.com](mailto:info@creditplace.com).

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