

## **HiStart Privacy Policy**

The Sponsor, through its HiStart Website <http://histart.toganetworks.com/> is committed to protecting your privacy during your participation in the Contest. The following discloses our information gathering, dissemination, and data security practices for the Contest Website. This Privacy Policy describes the ways the Sponsor collect, uses and discloses your personal information and the rights and options available to you. This is important; we hope you will take time to read it carefully.

All capitalized terms in this Privacy Policy shall the same meaning ascribed to the in the “*HiStart Content Official Rules*”

Our Privacy Policy explains: (i) what kind of information is collected by the Sponsor and why it is collected; (ii) how the Sponsor uses such collected information; (iii) the choices the Sponsor offers, including how to access and update information.

**IF YOU DO NOT AGREE WITH THIS POLICY, DO NOT USE OUR WEBSITE OR PROVIDE THE SPONSOR WITH YOUR PERSONAL INFORMATION.**

### **INFORMATION COLLECTED BY THE SPONSOR**

When You visit the Website, You might be providing information about your visit in the following ways:

#### Statistics collected as You browse the Website

Organizational and personal information You knowingly provide the Sponsor, such as the visited pages, location, from which domains You found a link to our Website page and information about which browsers & devices You used to visit our Website.

#### Your IP Address and Host Name

The Website logs Host Names (or IP addresses when the Host Name is not available) for system administration and security purposes. These logs are monitored and analyzed to maintain systems and information security and to allow Sponsor improve the value and the availability of its Website.

You are not required by law to provide the Sponsor with any of the above information; however, if You do not provide certain information, You may not be able to use all of the Website features.

**IF YOU ARE UNDER THE AGE OF 18 YOU MAY NOT USE OUR WEBSITE IN ANY WAY.**

### **USE OF PERSONAL INFORMATION**

The Sponsor collects your personal information when it is necessary for the performance of the Website and of the Contest. When the information is not necessary for the provision of the Services, our legal justification for the processing of your personal information will be your consent. Where our processing activities are based on your consent, you may withdraw your consent at any time, without affecting the lawfulness of data processing we carried out based on your consent before such withdrawal. The Sponsor may use or process your personal information for the following purposes. One or more purposes may apply simultaneously.

#### Data Collected on Website:

- To communicate with You, when you provide us your Submission;

- If You raise such an objection, Sponsor will no longer process your personal information for such purposes;
- To conduct surveys and questionnaires;
- To contact You when the Sponsor believes it to be necessary to your participation in the Contest, sending you updates and other communications related to the Contest;
- Generating statistical and aggregated information about users of the website;
- Providing You with support, handling complaints and contacting You in connection with the contest;
- Enforcing this Policy and preventing misuse of the Website;
- Complying with any applicable law and assisting law enforcement agencies and competent authorities, if the Sponsor believes it is necessary or justified;
- Taking any action in any case of dispute involving You, with respect or in relation to the Website and/or Contest;
- To use anonymized aggregated data that do not disclose any particular user's personal information for various commercial business analytics purposes;
- To prevent fraud, misappropriation, infringements, identity theft and other illegal activities and misuse of the Website;
- To handle breakdowns and malfunctions of the Website;
- To the extent the Sponsor intends to further use or process your personal information for a purpose other than set forth in this Policy, the Sponsor will provide You prior to that further use or processing with information on that other purpose.

The Sponsor will share with the Sponsor Affiliate and volunteer industry expert with the relevant personal details that are filled in the Submissions (including but limited to: email address, name, address, phone number) as part Contest's judgment process.

### **COOKIES**

A cookie is a small piece of information that is stored on a computer or device and may contain a device identifier for the purpose of recognizing your browser as you interact with websites. Device identifiers may be randomly generated or assembled from available system elements such as IP address, browser version, OS type and version, device type and settings, mobile device and advertising identifiers, wireless mobile subscriber ISDN numbers, public switched telephone network information, mobile network information or software data.

**YOU CAN CHOOSE TO CHANGE YOUR BROWSER SETTINGS TO DISABLE COOKIES IF YOU DO NOT WANT SPONSOR TO ESTABLISH AND MAINTAIN FOR YOU A UNIQUE USER ID. BE AWARE THAT COOKIES MIGHT BE REQUIRED TO COMPLETE CERTAIN FUNCTIONS ON OUR WEBSITE WITH RESPECT TO THE CONTEST.**

The Sponsor may use cookies and similar technologies in combination with other information it maintains for a number of purposes, including to:

- Deliver content relevant to the Contest;
- Provide analytics and reporting;
- to increase the Website's functionality and user-friendliness;
- Maintain information in both identifiable and de-identified forms;
- To support security measures;
- To assist in identifying possible fraudulent or abusive activities.

Sponsor may use "persistent cookies" to save your registration ID and login password for future logins to the Website. The Sponsor may use "session ID cookies" to enable certain features of the

Website, to better understand how You interact with the Website and to monitor aggregate usage and web traffic routing on the website.

Some of the cookies may expire when the session ends and You exit your browser. Other cookies are saved on your browser's memory.

### **YOUR RIGHTS AND DATA RETENTION**

You can request the deletion of the personal information the Sponsor has collected or withdraw your consent to the processing of such information, and disable its future collection by contacting the Sponsor at: [HiStart@toganetworks.com](mailto:HiStart@toganetworks.com). From that point, the Sponsor shall not have the right to process your personal information, and You'll not be allowed to use our Services or to continue participating in the Contest. Note, however, that You may withdraw consent at any time, without affecting the lawfulness of data processing carried out based on your consent before such withdrawal.

The Sponsor does not retain information longer than required to provide the Contest features and for reasonable business needs, or for other essential purposes such as complying with the Sponsor's legal obligations, resolving disputes, and enforcing the Sponsor agreements. Because these needs can vary for different data types in the context of different products, actual retention periods can vary significantly. The criteria used to determine the retention periods include:

- How long is the personal information needed to provide the website/ Contest features and operate our business? This includes such things as maintaining and improving the performance of the Sponsor's Website, keeping the Sponsor's systems secure, and maintaining appropriate business and financial records. This is the general rule that establishes the baseline for most data retention periods.
- Is the personal information of a special category under the General Data Protection Regulation (EU) 2016/679 (the "GDPR")? If so, a shortened retention time would generally be appropriate.
- Has the Sponsor adopted and announced a specific retention period for a certain data type?
- Have You provided consent for a longer retention period? If so, the Sponsor will retain data in accordance with your consent.
- Is the Sponsor subject to a legal, contractual, or similar obligation to retain the data? Examples can include mandatory data retention laws in the applicable jurisdiction, government orders to preserve data relevant to an investigation, or data that must be retained for the purposes of litigation.

The Sponsor may at all times review, retain and disclose any other information as the Sponsor deems necessary to satisfy any applicable law, regulation, legal process or governmental request and the Sponsor's needs and necessities. By doing so the Sponsor does not either expressly or impliedly endorse, affirm or in any manner assume any responsibility for such communications.

The authority supervising the Sponsor processing activity is the Israeli Privacy Protection Authority, and You have the right to file a complaint to it or any other relevant supervisory authority.

## **Information Security**

The Sponsor considers information security to be a top priority, and is committed to protecting the security of your personal information. The Sponsor implements systems, applications and procedures to secure personal information, to minimize the risks of theft, damage, loss of information, or unauthorized access or use of information, in particular where the processing involves the transmission of data over a network, and against all other unlawful forms of processing. When the Sponsor transmit highly confidential data over the Internet, it protect such information through the use of encryption. However, these measures are unable to provide absolute assurance.

Personal information collected by the Sponsor may be stored and processed in a various locations (also using cloud services), which are chosen in order to operate efficiently, to improve performance, and to create redundancies in order to protect the data in the event of an outage or other problem. The Sponsor take steps to ensure that the data it collects under this Privacy Policy is processed according to the provisions of this Policy and the requirements of applicable law wherever the data is located.

Therefore, although the Sponsor takes great efforts to protect your personal information, the Sponsor cannot guarantee, and You cannot reasonably expect that the Sponsor's databases will be immune from any wrongdoings, malfunctions, unlawful interceptions or access, or other kinds of abuse and misuse.

Questions about the security of personal information can be directed to: [HiStart@toganetworks.com](mailto:HiStart@toganetworks.com)

## **LINKS WITH OTHER WEBSITES AND SHARING INFORMATION WITH OTHERS**

This Privacy Policy applies only to the collection and use of information by the Sponsor and the Sponsor Affiliates. When You access other websites from hyperlinks on our website, remember that the Sponsor has no control over the content of those sites.

The Sponsor may use certain trusted third party companies and individuals (for example: Ortra Ltd) to help it provide, analyze, and improve the Website (including but not limited to data storage, maintenance services, database management, web analytics, and improvement of the Website's features), and for the purposes described in this Policy. The Sponsor may send them information it receives. These third parties may have access to your personal information only for purposes of participating in the Contest under obligations similar to those in this Privacy Policy. In such cases, these third parties must abide by the Sponsor's data privacy and security requirements and are not allowed to use personal information they receive from the Sponsor for any other purpose. When the Sponsor transfers personal information, it uses a variety of legal mechanisms, including contracts, to help it ensure your rights and protections travel with your data. The Sponsor will transfer personal information within assuring appropriate and suitable safeguards. In addition, the Sponsor may share your personal information with others, without your explicit consent, for the following purposes and to the extent necessary in the Sponsor's good-faith discretion:

- When it is necessary to facilitate the functionality of the Website and to provide you with the Services required for the participation in the Contest, or to prevent spam or attempts to defraud users participating in the Contest;
- If the Sponsor reasonably believes that You have breached the Terms of the Website, or abused your rights to use the Website, or performed any act or omission that the Sponsor

reasonably believes to be violating any applicable law, rules, or regulations. The Sponsor may share your information in these cases, with law enforcement agencies and other competent authorities and with any third party as may be required to handle any result of your wrongdoing;

- If disclosure is necessary in order to comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies;
- In any case of dispute, or legal proceeding of any kind between You and the Sponsor, or between You and other recipients in the Contest with respect to, or in relation with the Website and/or Contest;
- In any case where the Sponsor reasonably believes that sharing information is necessary to prevent imminent harm, physical damage or damage to the Contest;
- If the Sponsor organizes the operation of the Website within a different framework, or through another legal structure or entity, or if the Sponsor and/or any of its business is acquired by, or merged into or with another entity, or if the Sponsor enters bankruptcy, provided, however, that those entities agree to be bound by the provisions of this Policy, with respective changes taken into consideration;
- The Sponsor may also share personal information with the Sponsor Affiliates with the express provision that their use of such information must comply with this Policy.

#### **Policy Updates**

If You would like to correct and/or update information that You have previously provided, send an email to: [HiStart@toganetworks.com](mailto:HiStart@toganetworks.com)

The Sponsor may change this Privacy Policy from time to time, when it deems necessary. When changes to this Policy are published, the Sponsor will revise the "last modified" date at the top of the Policy. If the Sponsor makes a change to this Privacy Policy that it believes materially reduces your rights, the Sponsor will provide a notice prior to the change becoming effective. The Sponsor may provide notice of changes in other circumstances as well. By continuing to use the Website after those changes become effective, You fully agree to be bound by the revised Privacy Policy.

#### **CONTACTING THE SPONSOR ABOUT THE WEBSITE**

If You have any privacy concern, complaint, or questions about this privacy statement, the practices of this Website, or your dealings with this website, You can contact the Sponsor at: [HiStart@toganetworks.com](mailto:HiStart@toganetworks.com)