

## Introduction

- As part of the services provided by Arad Ltd. (and/or by affiliated companies and/or any other corporation within the "Arad" group, hereinafter: the "**Company**" and/or "**Arad**" and/or "**we**") to its business customers (local authorities, water corporations, and various companies, together: the "**Customers**"), Arad provides access to various operational and service systems, such as the "City Mind", "Harmony", "Harmony Encore", "MasterLinx", and similar systems (collectively, the "**Systems**"). These Systems are used by the representatives of the Company's Customers, including employees, technicians, and third parties assisting the Company's Customers in operating services for various consumers ("**User(s)**" and/or "**you**").
- This Privacy Notice ("**Privacy Notice**") was created to inform Users about the way we process, collect, and use personal information and non-personal information (as defined below) that is provided and/or collected through the Systems. In addition, this Privacy Notice describes the measures we take to secure personal information, as well as how you may contact us regarding this Privacy Notice.
- Use of the Systems and the services offered through them and/or the provision of personal information by the User, as applicable, may constitute the User's consent to the collection and use of personal information by Arad, on behalf of the Customers, in jurisdictions where consent is the primary legal basis for the processing of personal information. In other jurisdictions, the applicable legal bases for the processing of personal information will be as set out later in this Privacy Notice. Therefore, if you do not agree to any term or provision of this document, you are requested not to use the Systems.

## Definitions and Interpretation

- "**Personal Information**" means any data relating to an identified or reasonably identifiable individual, whether directly or indirectly. This includes information that you knowingly provide, for the purpose of receiving information and services made available through our Systems, as well as identifying information that the Customers provide to us on your behalf for the purpose of providing services under engagement with the Customers.
- "**Non-Personal Information**" means information that does not enable your identification or allow anyone to contact you. This includes technical information, anonymous information, or statistical and aggregated information that does not permit the identification of a User through reasonable efforts. For example, device type, browser type, operating system, language, and statistical information related to the scope of use of the Systems, including the date and time of use, duration of use, frequency of use, usage history, pages viewed, including pages that referred Users to the Systems. Subject to applicable law, Arad may use such information without restriction, and it is primarily used for operating the Systems, analyzing trends, improving the Systems, their content and user experience, and for internal statistics and analytics purposes.
- The division of this Privacy Notice into sections and the headings of such sections is for convenience only and shall not be used for interpretation purposes.

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### General

- The scope of this Privacy Notice is limited to information collected through Users' use of the Systems, whether such use is made through any computer or device used to access the services available through the Systems, including, without limitation, a desktop computer, laptop, mobile phone, or any other electronic device.
- Personal information is processed in accordance with applicable privacy and data protection laws (including, where applicable, the Israeli Protection of Privacy Law, 5741-1981, with respect to the processing of personal information relating to data subjects in Israel; Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, the General Data Protection Regulation ("GDPR"), with respect to the processing of personal information in the European Economic Area; and other applicable privacy and data protection laws in other relevant jurisdictions).
- In general, Arad acts as a service provider, processor, or equivalent role on behalf of its Customers with respect to personal information collected in connection with the use of the Systems and the services offered through them. However, with respect to operational information generated in the course of using the Systems, including user activity logs, Systems usage data, and details relating to the Customers' representatives using the Systems, Arad acts as an independent controller, for the purposes of operating, managing, securing, maintaining, monitoring, and improving the Systems, as well as for communicating with Users and/or Customers, all in accordance with applicable law.
- For the avoidance of doubt, such information is received and processed by Arad based on the permissions, authorizations, and other applicable legal bases (including, as applicable, performance of a contract, legitimate interests, compliance with a legal obligation, and/or consent, where required under applicable law) made available through the relationship between the Users and the Customers on whose behalf they act, whether as employees or service providers.

### How is Personal Information collected in the Systems?

- **Registration for and login to the Systems.** The Systems may require various login credentials in order to access the services available through them. As part of the registration and/or login process, you may be asked to enter and/or provide details such as your full name, mobile phone number, email address, consumer number, property number, and additional details. A two-factor authentication process or other authentication measures may also be required, depending on the type of System, the relevant service, and the applicable security requirements.
- **Technical support.** If you wish to contact Arad for technical support, you may contact us using the contact details appearing in the System you are using or by contacting the relevant Arad Customer on whose behalf you are using the Systems.
- **Input of personal information.** In certain Systems, the User may be asked to enter information or allow the collection of information which, in certain circumstances, may constitute personal information relating to the User. Such information may include, among other things, data regarding the User's location at the time of logging into the Systems or when performing various actions in the course of using them, such as handling a water meter, as well as any additional information that the User actually enters while using the Systems.

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- **Contacting Arad.** When contacting Arad, you may be asked to provide identifying details and contact information, as well as any additional information required in order to handle your inquiry, review your request, and provide an appropriate response. We will use the information provided as part of the inquiry for the purpose of managing our communications with you, documenting the handling of the inquiry, improving our service, and complying with applicable legal requirements, where relevant.

### Objectives of the collection and use of information

- We may use your personal information and non-personal information for the purpose of providing the services available through the Systems, operating and maintaining the Systems, resolving technical issues, improving the user experience, the services and content offered through the Systems, and ensuring the proper operation of the services or of other Arad systems. When Arad processes this information for its purposes, the legal bases for such processing, under the GDPR, include, performance of a contract with the Customers and Arad's legitimate interests.
- We may send operational communications, by Arad and/or by the relevant Customer on whose behalf you use the Systems, via email and/or SMS (and/or through any other media or system), in order to (a) provide you with the services available through the Systems, and (b) contact you for administrative purposes, such as support services or updates regarding changes or improvements relating to the Systems. We may also document our communications with you, including for the purpose of assisting in the resolution of issues you may encounter. When Arad processes this information for its purposes, the legal bases for such processing, under the GDPR, include, performance of a contract with the Customers and Arad's legitimate interests.

### Transfer of Personal Information to third parties

- We may share personal information with trusted third parties that assist us, as necessary, in operating the Systems, providing the services available through the Systems, managing our business, providing support and service to Users, maintenance, information security, monitoring, data analysis, and various statistical purposes. In addition, we may share personal information with the Company's Customers on whose behalf the Users act, to the extent required for the provision of services, management of the relationship with the Customers, documentation of activity in the Systems, handling inquiries, operational oversight, information security, and compliance with legal requirements. Such third parties may use your personal information only to the extent necessary to perform the services they provide to us, and they are required to implement security measures consistent with applicable law in order to maintain the confidentiality of and protect your personal information. Except as set out in this Privacy Notice, the personal information you provide will not be transferred to third parties.
- We may disclose personal information to courts, law enforcement authorities, regulators, governmental authorities, or other competent authorities, as well as to professional advisers, if we believe such disclosure is necessary or appropriate to comply with legal obligation, regulation, legal process, or an enforceable governmental request; to avoid legal liability; to protect our rights, property, or interests, or those of our Customers, Users, or third parties; to protect public safety or the safety of any individual; or to detect, prevent, or address illegal, fraudulent, unethical, or otherwise harmful activity, including any actual or suspected breach of the terms governing the use of the Systems or the services offered by the Company.

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- We may transfer, disclose, or otherwise make available some or all of our assets, including personal information, in connection with an actual or contemplated corporate transaction or organizational change, including a merger, acquisition, financing, reorganization, sale of assets, transfer of business operations, or bankruptcy or similar proceeding. In such circumstances, personal information may be disclosed to relevant counterparties and advisers, subject to customary confidentiality protections and applicable legal requirements.

### **Rights of Information Subjects**

- Applicable privacy and data protection laws may grant you certain rights in relation to your personal information, depending on the jurisdiction in which you are located and the manner in which your personal information is processed. These rights may include the right to access, review, correct, update, delete, or restrict the processing of your personal information, as well as any additional rights available under applicable law.
  - Without derogating from the foregoing, pursuant to the Protection of Privacy Law, 5741-1981, you may be entitled to review the information about you that is held in the Company's databases and to request that the Company correct or delete such information if it is not correct, complete, accurate, or up to date.
  - If you are located in the European Union or the European Economic Area, you may also be entitled to additional rights under the GDPR. please see detailed disclosures of your rights here:  
[https://commission.europa.eu/law/law-topic/data-protection/information-individuals\\_en](https://commission.europa.eu/law/law-topic/data-protection/information-individuals_en).
- To the extent that Arad is the controller of the relevant personal information, Arad will handle your request in accordance with applicable law. To the extent that Arad process personal information on behalf of its Customers, Arad will forward your request to the relevant controller of such information or instruct you how to contact it directly for the purpose of exercising your rights. Arad may request certain details for identification purposes before responding to your request and/or before forwarding the request to the relevant controller of the information.

### **Duration of Retention of Personal Information**

- Your personal information will be retained for no longer than is necessary for the purposes for which it is processed, in accordance with applicable law and, where relevant, the instructions of Arad's Customers where such Customers act as the controller of the personal information.
- Arad may retain your personal information for a longer period where necessary: (a) to comply with applicable law, regulation, or an instruction of a competent authority; (b) to comply with contractual obligations; (c) to establish, exercise, or defend legal claims; (d) to resolve disputes; and/or (e) to enforce applicable agreements.

### **Information Security**

- Arad implements customary security measures intended to protect the confidentiality of personal information and to reduce the risk of unauthorized access to or use of personal information. However, absolute protection cannot be guaranteed, and security breaches or unauthorized intrusions into the Systems may occur that are beyond Arad's reasonable control.

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## **Operational and Service Systems Privacy Notice**

- You acknowledge, accept, and agree that Arad shall not be liable for any damage of any kind, whether direct or indirect, caused to you and/or anyone on your behalf if personal information is lost, disclosed, or subject to any unauthorized use, and you further acknowledge and agree that you shall have no claim and/or demand and/or cause of action against Arad and/or anyone on its behalf in such circumstances and for any damage caused to you, if any, as a result thereof.
- Arad may store personal information in Israel and in other jurisdictions and/or permit access to personal information from jurisdictions outside Israel. Accordingly, when using the Systems, your personal information may be transferred to, stored in, or processed in countries outside your jurisdiction of residence, including outside Israel. Where such cross-border transfers are subject to specific legal requirements under applicable privacy and data protection laws, Arad will take appropriate measures to ensure that such transfers are carried out in accordance with applicable law, including, where required, by relying on an adequacy decision, contractual protections such as standard contractual clauses, intra-group transfer mechanisms, or other lawful transfer mechanisms.
- If you identify any security vulnerabilities or wish to report a security incident, please contact us at [dpo@arad.co.il](mailto:dpo@arad.co.il) or through the contact channels available in the Systems and set out in this Privacy Notice.

### **Age and Competence Restriction**

- The use of the Systems is intended for adults over the age of 18 only. If you are under 18 years of age and/or do not have legal capacity, you are required not to make any use of the Systems or of the services offered by Arad and not to provide us with any information.

### **References and Links to Other Websites**

- The Systems may include references to third parties and links or referrals to other websites owned and/or operated by third parties (including the Company's Customers). For the avoidance of doubt, this Privacy Notice does not apply to such references or websites, and any use by you thereof is subject to their respective privacy policies. We encourage you to review the privacy and security policies of such third parties before providing them with any information relating to you.

### **Privacy Notice Updates**

- We reserve the right to update this Privacy Notice from time to time. The most current version shall be the binding version with respect to the manner in which your personal information and non-personal information are used. If we determine, in our sole discretion, that changes to this Privacy Notice are material, we will publish a notice in the relevant System you use. However, we are not obligated to notify you of changes that are not material, and therefore we recommend that Users review this Privacy Notice periodically to remain informed of its binding terms.

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**Contact**

- If you have any questions regarding this Privacy Notice or any other matter relating to the services available through the Systems, please contact us at the email address of the Company's Data Protection Officer: dpo@arad.co.il, and the Company will make reasonable efforts to respond to your inquiry within a reasonable period of time.

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