

PRIVACY POLICY

[Last Updated: July 10, 2023]

Magenta Medical Ltd. ("**Company**", "**we**", "**us**" or "**our**") respects your privacy and recognizes that your privacy is important.

This privacy policy ("**Privacy Policy**") explains the Company's practices regarding the collection, processing, usage and transfer of Personal Data, that are applicable towards any visitor of our website available at <https://magentamed.com/> ("**Visitor**" or "**you**" and "**website**" or "**Services**"). Please note that this Privacy Policy does not govern the use of our products and other services.

This Privacy Policy provides the required information under the EU General Data Protection Regulation ("**GDPR**") and other applicable US Privacy state laws, to the extent applicable.

In the event you are a **California, Virginia, Nevada, Connecticut, or Colorado resident** – please make sure to review our US Privacy Notice to learn more about our privacy practices with respect to the applicable US privacy state laws.

You are not required by law to provide us with any Personal Data, however, please note, that some of our Services require the processing of certain Personal Data and without such data we may not be able to provide you with all or part of the Services.

Data Controller, Data Protection Officer & Representative

Magenta Medical Ltd., incorporated under the laws of the State of Israel, is the "Data Controller" (as such term is defined under the GDPR or equivalent privacy legislation) of the Personal Data collected from Visitors with regards to their use of the Website.

If you have any question, inquiry, request or concern related to this Privacy Policy or the processing of your Personal Data, you may contact us, and our privacy team as follows:

- By Email: info@magentamed.com; or
- By Mail: 1 Ha'Ofeh Street, P.O.B. 5035, Kadima 60920, Israel

The Data We Collect & Our Lawful Basis for Processing Your Personal Data

Depending on your interaction with us, meaning if you browse our website, we collect two types of data:

"Non-Personal Data" meaning, information which does not identify a specific natural person and cannot reasonably be used for such identification. We collect Non-Personal Data regarding use of the website, such as the scope, frequency, latency, pages accessed and viewed, time and date stamp, interactions with content and materials displayed through our website, language preference, and other technical information regarding the device used to access the website, for example type of device, type of browser, operating system, etc. These data are considered as Non-Personal Data when collected on an aggregate basis, or otherwise not combined with online identifiers.

Also, we may sometimes process and anonymize or aggregate Personal Data and identifiable information in a manner that shall create a new set of data that will be Non-Personal Data. Such a new data set can no longer be associated with any identified natural person.

Non-Personal Data may be used by us without limitation and for any purpose, including for commercial, research, or statistical purposes, in order to maintain and develop our website, including,

among others, for ensuring the technical functioning of our website, to help prevent fraudulent use of the website, etc.

" Personal Data" meaning, individually identifiable information, namely information that identifies an individual or may with reasonable effort be used to identify an individual. This may include online identifiers, first and last name, email address, etc.

If we combine Personal Data with Non-Personal Data, we will treat the combined data as Personal Data.

We have included in the table below information about the types of Personal Data processed, how we process and use Personal Data, the lawful basis for which we do so subject to the GDPR and processing operations.

Type of Data	Purpose of Processing & Operation	Lawful Basis
<p>Device Identifiers and Online Usage</p> <p>When you interact with the website, we may collect online identifiers such as your Internet Protocol address ("IP"), Cookie-ID, etc., as well as other information that relates to your activity through the website, such as pages viewed, click stream data, login time and date stamp, etc. These data might be collected directly by us or through our use of third parties' cookies.</p>	<p>Collection of device identifiers is needed for the following purposes:</p> <p>(i) Website's operation, security and fraud detection purposes, and for example, when you fill in a form on our website, in order to detect and prevent malicious attacks;</p> <p>(ii) Internal statistics and analysis, for which device identifiers might be combined with usage data, for example, to analyze how many Visitors have accessed certain content and from which country (where the country is extracted from the IP address) in order to enhance and improve our website and its content;</p> <p>(iii) Marketing and advertising purposes.</p> <p>Note that, we do not attempt to analyze or determine your identity based on such information or otherwise combine it with any information such as your name or email address.</p>	<p>Our lawful basis for processing these data for operation and security purpose is based on our legitimate interests.</p> <p>Where required under applicable laws, we will obtain your consent for the purpose of data collection through our use of third-party cookies for analytics and advertising purposes. In any such case, you may withdraw consent or change your preferences at any time by using the cookie settings tool available on our website.</p>
<p>Contact Communications</p> <p>If you voluntarily contact us through any means of communication, we make available (e.g., send us an</p>	<p>We process your contact information solely for the purpose of contacting you, responding to your inquiries and providing you with the support</p>	<p>We process such data subject to our legitimate interest.</p>

<p>email, or use any other online form available on our website), you will be requested to provide us with your contact information such as your name, phone number and email address.</p>	<p>or information you have requested.</p> <p>The correspondence with you may be processed and stored by us in order to improve our internal operation, as well as in the event we reasonably determine it is needed for future assistance or to handle any dispute you might have with us.</p>	
<p>Newsletter & Updates Registration</p> <p>In the event you sign up to receive our newsletter or other promotional materials, you will be requested to provide your contact details, such as email address.</p>	<p>We will use the information you provide in order to include you in our mailing list and send you the materials you have signed up to receive.</p>	<p>Our lawful basis for the processing of these data is your consent.</p> <p>You may withdraw your consent at any time by clicking the “unsubscribe” link which will be included in the email we will send you. You may also contact us through the above means of contact and request to unsubscribe.</p>
<p>Job Applications</p> <p>If you wish would apply for any position posted on our website, you will be requested to provide certain information such as your name, e-mail address, phone number, and your CV. You may also choose to provide us additional information such as recommendations from previous employers, your LinkedIn profile, etc.</p>	<p>We collect and process these data in order to examine your resume in the context of managing our recruiting and hiring process.</p> <p>In addition, we will use such information to demonstrate compliance with corporate governance and legal and regulatory requirements.</p> <p>Please note, in the event you send us your CV, your provision of Personal Data in connection with recruiting is voluntary, and you determine the extent of information you provide us. We do not request or require sensitive personal information concerning religion, health, sexual orientation, or political affiliation in connection with recruiting. However, if such information may be provided by you, e.g., for diversity and inclusion purposes, it will be treated with great care subject to your will and consent.</p>	<p>Our lawful basis for processing these data is our legitimate interest.</p>

	If you are hired, the information may be used in connection with employment and corporate management.	
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How We Collect Information

Depending on the nature of your interaction with us through the website, we may collect information as follows:

- ***Automatically*** – we may use cookies (as elaborated in the section below) or similar tracking technologies (such as pixels, tags, agents, etc.) to gather some information automatically.
- ***Provided by you or about you voluntarily – we will collect information if and when you choose to*** provide us with the information, such as through online registration, contact us form, etc. all as detailed in this Privacy Policy.

Cookies

When you access or use the website, we use “cookies” or similar tracking technologies, which store certain information on your device (i.e., locally stored). The use of cookies is a standard industry-wide practice. A “cookie” is a small piece of information that a website assigns and stores on your computer while you are viewing a website. Cookies are used by us for various purposes, including allowing you to navigate between pages efficiently, as well as for statistical purposes, analytic purposes and advertising. You can find more information about our use of cookies here: www.allaboutcookies.org.

There are several types of cookies, and among others:

- **Essential, Functionality, Operation & Security Cookies.** These cookies are essential for enabling Visitor movement around the website, for the website to function properly, and for security purposes (i.e., used to authenticate Visitors, prevent fraudulent use, and protect Visitor data from unauthorized parties). This category of cookies either cannot be disabled, or if disabled, certain features of the website may not work.
- **Analytic, Measurement & Performance Cookies.** These cookies are used to collect information about how Visitors use our website, in order to improve our website, content, and the way we offer them, as well as assess performance of the content and marketing campaigns. These cookies enable us, for example, to assess the number of Visitors who have viewed a certain page as well as their country of origin. It enables our website to remember information that changes the way it behaves or looks, such as your preferred language. We do so usually through designated partners such as Google Analytics. Such partners collect Visitors’ data and analyse them to provide us with enriched statistics and aggregated data about our website usage. Such partners may do so through the use of their own data, controlled independently by them, under their privacy policies and practices as further explained at <https://policies.google.com/technologies/partner-sites>.
- **Preference, Targeting & Advertising Cookies.** These cookies are used to advertise across the internet and to display relevant ads tailored to Visitors based on the parts of the website they have accessed (e.g., the cookie will indicate you have visited a certain webpage and will show you ads relating to that webpage).

You may find more information about the cookies we use as well as opt out of cookies or change your preferences ant any time by using the cookies setting tool available on our website.

Also note that, most browsers will allow you to erase cookies from your computer’s hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. You may set your browser to block all cookies, including cookies associated with our website, or to indicate when a cookie is being used by us, by adjusting the privacy and security settings of your web browser. Please refer to the support page of your browser to learn more about how you can adjust your privacy and security settings. Please note that once you choose to opt out or disable cookies, some features of the website may not operate properly, and your online experience may be limited.

Where we use third-party advertising cookies, such third-party may independently collect, through the use of such tracking technologies, some or all types of Personal Data detailed above, as well as additional data sets, including to combine such information with other information they have independently collected relating to your online activities across their network of websites, for the purpose of enhanced targeting functionality and delivering personalized ads, as well as providing aggregated analytics related to the performance of our advertising campaign you interacted with. These third parties collect and use this information under their own privacy policies, and we are not responsible for their privacy practices.

Data Sharing – Categories of Recipients We Share Personal Data With

We share your Personal Data with third parties, including with trusted partners or service providers that help us to manage our business operation, website, etc. You can find here information about the categories of such third-party recipients.

Categories of Recipients	Additional Information
Our Affiliated Companies	We may share Personal Data with our affiliated companies and subsidiaries in order to provide joint services, for example, marketing, customer support, recruitment, etc. We may further share certain types of Personal Data about you as may be necessary to help detect and prevent potentially illegal acts, violations of our policies, fraud and/or data security breaches.
Our Service Providers	<p>We may share your Personal Data with our trusted service providers and business partners that perform business operations for us on our behalf (as data processors) and pursuant to our instructions.</p> <p>This includes the following categories of service providers:</p> <ul style="list-style-type: none"> ● Advertising and marketing service providers, who help us with advertising measurements, email marketing, etc.; ● Data storage providers, with whom we entrust the hosting and storage of our data; ● Customer support providers, who help us perform such functions as customer support and customer service; ● Data analytics and data management providers, who help us improve, personalize and enhance our operation, such as Google Analytics; ● Data security partners, who help us detect and prevent potentially illegal acts, violations of our policies, fraud and/or data security breaches and ensure compliance with legal obligations.

Legal and Law Enforcement	We may disclose certain Personal Data to law enforcement, governmental agencies, or authorized third parties, in response to a verified request relating to criminal investigations or alleged illegal activity or any other activity that may expose us, you, or any other Visitor to legal liability, and solely to the extent necessary to comply with such purpose.
Corporate Transactions	<p>In the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation, or asset sale) we will share the Personal Data we store with our acquiring company.</p> <p>We will obligate the acquiring company to assume the rights and obligations as described in our Privacy Policy.</p>

Where we share Personal Data with service providers and partners, we ensure they only have access to such information that is strictly necessary for us to provide the services of fulfil the purpose for which data was shared. These parties are required to secure the Personal Data they receive and to use the data for pre-agreed purposes only, while ensuring compliance with applicable data protection regulations (note that, such service providers may use other Non-Personal Data for their own benefit).

Cross-Border Data Transfer

Due to our global business operation, we may store or process your Personal Data in several territories, including, for example in Israel, the UK, EU, US or in other countries. Thus, your Personal Data may be transferred to and processed in countries other than the country from which you accessed our websites or otherwise the country of your jurisdiction. We will take appropriate measures to ensure that your Personal Data receives an adequate level of data protection upon its transfer. Where Personal Data collected from within the EU or UK, is being transferred outside such territories to countries which didn't receive an adequacy decision on behalf of an authorized authority (such as the EU Commission), we will take necessary steps in order to ensure that sufficient safeguards are provided during the transferring of such Personal Data, in accordance with the provision of the standard contractual clauses approved by the European Union or the UK Information Commissioner's Office . Thus, we will obtain contractual commitments or assurances from the data importer to protect your Personal Data, using contractual protections that EEA and UK regulators have pre-approved to ensure your data is protected (known as standard contract clauses), or rely on adequacy decisions issued by the European Commission. Some of these assurances are well-recognized certification schemes.

In addition, some of the third parties used for cookies management on our website, may store and process data globally, including in the US (e.g., Google Analytics servers). When granting consent for such cookies through the cookies tool on the website, you hereby acknowledge and approve such cross-border transfer, in accordance with such third party's privacy practices.

Data Retention

We retain the Personal Data we collect as long as it remains necessary for the purposes set forth above, all in accordance with applicable laws, or until an individual expresses a preference to opt out.

In certain circumstances, we will retain your Personal Data for longer periods of time and mainly:

- Where we are required to retain Personal Data in accordance with legal, regulatory, tax, or accounting requirements;

- Where we deem retention is necessary to obtain an accurate record of your dealings with us in the event of any complaints or challenges; or
- If we reasonably believe there is a prospect of litigation relating to your Personal Data.

We may, at our sole discretion, delete or amend information from our systems, without notice to you, once we deem it is no longer necessary for such purposes.

Privacy Rights

We acknowledge that different people have different privacy concerns and preferences. Our goal is to be clear about what information we collect, so that you can make meaningful choices about how it is used. We provide you with the ability to exercise certain choices, rights and controls in connection with your Personal Data. Depending on your relationship with us (e.g., if you are a visitor to our website or a Visitor), your jurisdiction and the data protection laws that apply to you, you have the right to control and request certain limitations or rights to be executed.

For detailed information on your rights and how to exercise your rights, please see the Data Subject Request (“DSR”) form available [HERE](#) and send it to us at: info@magentamed.com.

Certain rights can be easily executed independently by you without the need to fill out the DSR form, and for example:

- You can opt out from receiving our marketing emails by clicking the “unsubscribe” link;
- You can use the cookie settings tool on our website to change your preferences.

Where we are not able to provide you with the information for which you have asked, we will endeavour to explain the reasoning for this and inform you of your rights, including the right to complain to the supervisor authority (in the event you are EEA resident). We reserve the right to ask for reasonable evidence to verify your identity before we provide you with any such information in accordance with applicable law.

Security

We take reasonable care in implementing and maintaining the security of our website Visitors’ Personal Data. We employ industry standard procedures and policies to ensure the safety of individuals’ information and prevent unauthorized use of any such.

We have implemented technical, physical and administrative security measures to protect the Personal Data we process. In addition, we limit access to Personal Data stored by us.

Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorized access or abuse our website, and we make no warranty, express, implied or otherwise, that we will always be able to prevent such access.

Please contact us at: info@magentamed.com, if you feel that your privacy was not dealt with properly, in a way that was in breach of our Privacy Policy, or if you become aware of a third party's attempt to gain unauthorized access to any of your Personal Data. We will make a reasonable effort to notify you and the appropriate authorities (if required by applicable law) in the event that we discover a security incident related to your Personal Data.

Third Party Websites

Our Privacy Policy only addresses the use and disclosure of Personal Data we collect from you. To the extent that you disclose your Personal Data to other parties via the website (e.g., by clicking on a link to any other website or location), different rules may apply to their use or disclosure of the Personal Data you disclose to them, and this Privacy Policy does not apply to any such third-party products and services. You agree that we shall have no liability whatsoever with respect to such third-party sites and your usage of them.

Children's Data

The website is not intended for individuals under the age of eighteen (18). Accordingly, we do not knowingly solicit Personal Data from or market to children as defined under applicable law. We request that such individuals do not provide Personal Data. If you become aware or have any reason to believe that a child has shared any Personal Data with us, please contact us through the means of contact detailed herein.

Changes and Updates

We reserve the right to change this Privacy Policy at any time, so please re-visit this page frequently. In the event of any substantial change of this Privacy Policy, we will make reasonable efforts to post a clear notice on the website, and obtain your consent where required under applicable laws. Changes to this Privacy Policy are effective as of the stated "*Last Updated*" date, and your continued interaction with us thereafter will constitute acceptance of, and agreement to be bound by, those changes.