

ACTIVEFENCE PLATFORM PRIVACY POLICY

Last Updated: May 2021

In order to ensure transparency and give you more control over your Personal Data, this privacy policy (“**Privacy Policy**”) governs how we, ActiveFence Ltd. and its affiliates (together, “**ActiveFence**” “**we**”, “**our**” or “**us**”) use, collect and store Personal Data that we collect or receive from or about you in connection with our Proactive Trust and Safety, online integrity, platform and SDK (collectively, the “**Platform**”). In this Privacy Policy, “Personal Data” means any information that can be used, alone or together with other data, to uniquely identify any living human being.

1. WHAT PERSONAL DATA WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

Personal Data we collect	Why is the Personal Data collected and for what purposes?	Legal basis (GDPR only, if applicable)	Consequences of not providing the Personal Data
<i>When you create an account on the Platform</i>			
• First and last name; • Email address; • Phone number (optional)	• To create an account	• Processing is necessary for the performance of a contract between us.	You won’t be able to use the Platform.
<i>When you upload content to the Platform and/or is flagged by the Platform.</i>			
• First and last names; • Nicknames; • Profile pictures; • User handles; • User descriptions; • “about me” posts; • Published content; and • Any other personal data you choose to upload to the Platform.	• To provide you with our services; • process and answer your questions and respond to your requests	• Processing is necessary for the performance of a contract between us. • Legitimate interest.	You won’t be able to utilize some or all of the Platform’s features.

2. HOW WE PROTECT AND RETAIN YOUR PERSONAL DATA

- 2.1. Security. We have implemented appropriate technical, organizational and security measures designed to protect your Personal Data. However, please note that we cannot guarantee that the information will not be compromised as a result of unauthorized penetration to our servers.
- 2.2. Retention of your Personal Data. Your Personal Data will be stored until we no longer need that data and proactively delete it, unless you send a valid deletion request. However, in some circumstances we may store your Personal Data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings.

3. HOW WE SHARE YOUR PERSONAL DATA

we may share your Personal Data as follows:

- 3.1. With our affiliated companies.
- 3.2. To the extent necessary, with regulators, courts or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- 3.3. If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, or are acquired by, or merged with, a third party entity, we will disclose your Personal Data to such third party (whether actual or potential) in connection with the foregoing events;
- 3.4. Where you have provided your consent to us sharing or transferring your Personal Data.

4. INFORMATION REGARDING TRANSFERS OF PERSONAL DATA

- 4.1. Internal transfers: Transfers within the ActiveFence group will be covered by an intra-group internal data processing agreement which contractually obliges each member to ensure that Personal Data receives an adequate and consistent level of protection wherever it is transferred to.
- 4.2. External transfers: Where we transfer your Personal Data outside of EU/EEA (for example to third parties who provide us with services), we will obtain contractual commitments from them to protect your Personal Data.

5. YOUR PRIVACY RIGHTS.

- 5.1. Rights: The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by the GDPR):
 - You have a right to access Personal Data held about you. Your right of access may normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
 - You have the right to request that we rectify any Personal Data we hold that is inaccurate or misleading;
 - You have the right to request the erasure/deletion of your Personal Data (e.g. from our records). Please note that there may be circumstances in which we are required to retain your Personal Data, for example for the establishment, exercise or defense of legal claims;
 - You have the right to object, to or to request restriction, of the processing;
 - You have the right to data portability. This means that you may have the right to receive your Personal Data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
 - You have the right to object to profiling;
 - You have the right to withdraw your consent at any time. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations. Also, please note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal;
 - You also have a right to request certain details of the basis on which your Personal Data is transferred outside the European Economic Area, but data transfer agreements and/or other details may need to be partially redacted for reasons of commercial confidentiality;

- You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place or work or place of alleged infringement) at any time or before the relevant institutions in your place of residence. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority and/or relevant institution.

You can exercise your rights by contacting us - privacy@activefence.com. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

- 5.2. Deleting your account: Should you ever decide to delete your account, you may do so by emailing privacy@activefence.com. If you terminate your account, any association between your account and Personal Data we store will no longer be accessible through your account.

6. USE BY CHILDREN

In the context of the use cases described in this Privacy Policy, we do not knowingly collect Personal Data from children under the age of eighteen (18). If you are under the age of eighteen (18), do not provide any Personal Data to us without involvement of a parent or a guardian. In the event that we become aware that you provide Personal Data in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at privacy@activefence.com.

7. INTERACTION WITH THIRD PARTY PRODUCTS

In case we enable you to interact with third party websites, mobile software applications and products or services that are not owned or controlled by us (each a “Third Party Service”), we are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect Personal Data from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

8. MODIFICATION

This Privacy Policy can be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy. If we implement significant changes to the use of your Personal Data in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

9. CONTACT US

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at privacy@activefence.com.
