

## **Privacy Policy**

We, at Joca Media Ltd. (“**Joca Media**”, “**we**”, “**our**” or “**us**”) put great efforts into making sure that the personal information processed by us (if any) is safe and used properly, and that our privacy practices are properly communicated to you.

This Privacy Policy (this “**Policy**”) describes how we collect, store, use and disclose personal data regarding individual (“**you**”) who: (i) visits or otherwise interacts with our website (at: <https://www.jocamedia.com/>), social media pages, online ads and content, e-mails, customer support team or other communications under our control (collectively, the “**Sites**”); (ii) who is a prospective or existing publisher, who uses or is interested in using our services (the “**Service**”); and/or (iii) who is a prospective or existing advertising partner, agency or network.

Specifically, this Policy covers:

1. Information That We Collect
2. How We Use Personal Information Collected
3. Sharing Personal Information
4. Disclosure of Personal Information
5. Retaining Personal Information
6. Cookies and Tracking Technologies
7. Data Security
8. Your Choices
9. Your EU Data Subject Rights
10. Additional Notices

**Please read this Policy carefully and make sure that you fully understand our privacy practices.**

**You are not legally required to provide us with any personal information and may do so (or avoid doing so) of your own free will. If you do not wish to provide us with your personal information or to have it processed by us or any of our Service Providers, please avoid any interaction with us or any use of our Service.**

### **1. Information That We Collect**

- Personal information that you provide us, when you use our Service, communicate with us by phone, email, social media or otherwise provide personal information to us.
- Usage data that we automatically collect, through your interaction with our website by using “Cookies” (Please learn more about how we use cookies at Section 7). We also may collect information about how you use our website, your log-in and log-out time, the duration of sessions, viewed specific content on web pages, activity measures and frequency and geo-location.

### **2. How We Use Personal Information Collected**

- We use personal information as necessary to provide our Service; to comply with our legal and contractual obligations; to support our legitimate interests in maintaining, improving and advertising our Service and protect and secure you, ourselves and our Service from misuse.

If you reside or are using the Service in a territory governed by privacy laws under which “consent” is the only or most appropriate legal basis for the processing of personal information as described herein (in general, or specifically with respect to the types of personal information you expect or elect to process or have processed by us), your acceptance of this Policy will be deemed as your consent to the processing of your personal information for all purposes detailed in this Policy. If you wish to revoke such consent, please contact us via [privacy@jocamedia.com](mailto:privacy@jocamedia.com).

Specifically, we use personal information for the following purposes:

- To facilitate, operate, and provide the Sites and Service.
- To monitor, study and analyze the use of the Sites and Service.
- To contact you with general or personalized service-related messages, as well as promotional messages that may be of specific interest to you.
- To enforce this Policy and other contractual arrangements.
- To comply with court orders and warrants and prevent misuse of the Sites or Service and to take any action in any legal dispute and proceeding.
- To gain a better understanding on how you use and interact with our Sites or Service, and how we could improve users’ experience, and continue improving our products, offerings and overall performance of our Sites and Service.
- To support and enhance our data security measures, including for the purposes of preventing and mitigating the risks of fraud, error or any illegal or prohibited activity.
- To create aggregated statistical data, inferred non-personal data, or anonymized or pseudonymized data (rendered non-personal and non-identifiable), which we or our Service Providers may use to provide and improve our Sites or Service, or for any other purpose; and
- To comply with applicable laws and regulations.

### 3. Sharing Personal information

- *Service Providers.* We may engage selected third-party to perform services complementary to our Service. Such service providers may include hosting and server co-location services, communications and content delivery networks (CDNs), data security services, fraud detection and prevention services, payment collection, web analytics, e-mail distribution and monitoring services, session, call or activity recording and analysis services, remote access services, performance measurement, data optimization and marketing services, social and advertising networks, content providers, e-mail, support and customer relation management systems, and our legal, financial and compliance advisors (collectively, “**Service Providers**”). Our Service Providers may have access to personal information, depending on each of their specific roles and purposes in facilitating and enhancing the Service, and may only use the information for such limited purposes and commit to protecting your privacy as determined in our agreements with them.
- *Protecting Rights and Safety.* We may share personal information with others, if we believe, in good faith and in our sole discretion that this will help protect the rights, property or personal safety of our Service, our users or any members of the general public.
- *Structural Change.* A merger, acquisition or any other structural change will require us to transfer your personal information to another entity, as part of the structural change, provided that the receiving entity will comply with this policy.

#### **4. Disclosure of Personal Information**

We usually do not disclose or share your personal information. We may disclose or allow government, public authorities and law enforcement officials access to your personal information, in response to a subpoena, search warrant or court order (or similar requirement), or in compliance with applicable laws and regulations. Such disclosure or access may occur if we believe in good faith that: (a) we are legally compelled to do so; (b) disclosure is appropriate in connection with efforts to investigate, prevent or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing; or (c) such disclosure is required to protect our legitimate business interests, including the security or integrity of our Service.

#### **5. Retaining Personal Information**

We retain your personal information only for as long as it is reasonably necessary in order to maintain and expand our relationship and provide you with the Service; in order to comply with our legal and contractual obligations; to pursue our legitimate business purposes; or to protect ourselves from any potential disputes (i.e. as required by laws applicable to log-keeping, records and bookkeeping, and in order to have proof and evidence concerning our relationship, should any legal issues arise following your discontinuance of use), all in accordance with this policy.

Please note, that except as required by applicable law or our specific agreement with you, we will not be obligated to retain your personal information for any particular period, and we are free to securely delete it, restrict access to it, or de-identify potentially identifiable information at our sole discretion.

If you have any questions about our data retention policy, please contact us via [privacy@jocamedia.com](mailto:privacy@jocamedia.com).

#### **6. Cookies and Tracking Technologies**

We and our Service Providers use cookies and other technologies for performance, tracking, analytics and personalization purposes. We may share non-identifiable or aggregated extracts of such information with our partners for our legitimate business purposes.

Cookies are packets of information sent to your web browser and then sent back by the browser each time it accesses the server that sent the cookie. Some cookies are removed when you close your browser session. These are the “Session Cookies”. Some last for longer periods and are called “Persistent Cookies”. We use both types.

Whilst we do not change our practices in response to a “Do Not Track” signal in the HTTP header from a browser or mobile application, you can manage your cookies preferences, including whether or not to accept them and remove them, through your browser settings. Please bear in mind that disabling cookies may complicate or even prevent you from using the Service.

We may also use analytics tools such as Google Analytics. These tools help us understand users’ behavior on our website, including by tracking page content, and click/touch, movements, scrolls and keystroke activities. The privacy practices of these tools are subject to their own privacy policies. See [Google Analytics Privacy Policy](https://policies.google.com/technologies/partner-sites) at <https://policies.google.com/technologies/partner-sites>.

## **7. Data Security**

We implement systems, applications and procedures to secure your personal information, to minimize the risks of theft, damage, loss of information, or unauthorized access or use of information. These measures provide sound industry-standard security, however, although we make efforts to protect your privacy and personal information, we cannot and do not guarantee the absolute protection and security of any personal information stored with us or with any third-parties.

## **8. Your Choices**

Please note that when you ask us to exercise any of your rights under this Policy or any applicable law including the EU or UK GDPR, the California Consumer Privacy Act (CCPA) / California Privacy Rights Act (CPRA), the Virginia Consumer Data Protection Act (VCDPA), or the Colorado Privacy Act (CPA), we may need to ask you to provide us certain credentials to make sure that you are who you claim you are and to ask you to provide further information to better understand the nature and scope of information that you request to access.

Such additional information will be then retained by us for legal purposes (e.g., as proof of the identity of the person submitting the request).

We may redact from the information which we will make available to you, any personal information or confidential information related to others.

## **9. Your EU Data Subject Rights**

If EU data protection laws apply to the processing of personal data related to you, then you have the following rights:

- If the data processing is based on consent, note that you have the right to withdraw your consent at any time, but that the withdrawal of your consent does not affect the lawfulness of processing based on consent before its withdrawal.
- Request access to the personal data that we have about you.
- Request a copy of your personal data in electronic format or ask to directly transfer your personal data in accordance with your right to data portability.
- Request to rectify or correct any personal data that is inaccurate or incomplete.
- Request to delete or restrict access to your personal data when it is no longer needed for the purposes for which you provided it, as well as the right to restrict the processing of your personal data to certain limited purposes where erasure is not possible.

To exercise any of these rights, please contact us at [privacy@jocamedia.com](mailto:privacy@jocamedia.com).

Further details about your rights under EU data protection laws, is available on the EU Commission's website at:

If you are a GDPR-protected individual, you also have the right to lodge a complaint with the relevant supervisory authority in the EEA or the UK, as applicable.

Additionally In the event of an erasure request, we may retain a copy of your personal data for our record-keeping purposes.

## 10. Additional Notices

- Applicable law and dispute resolution: This Privacy Policy shall be exclusively governed by and construed in accordance with the laws of the state of Israel. The courts of Tel-Aviv, Israel shall have exclusive jurisdiction in all disputes and proceedings arising from this Policy.
- External Links: Our website may include links to third party websites, and integrations with third party services. Such websites and third-party services, and any information you process, submit, transmit or otherwise use with such websites and third-party services, are governed by such third party's terms and privacy practices and policies, and not by this Policy. This Policy applies solely to personal information collected by our website. We encourage you to carefully read the terms and privacy policies of such website and third-party services. This Policy applies only to our website and to our services. If you upload content, including personal information, to a social network and then tag our website, your submission will be subject to that social network's terms of use and privacy policy, even when you post on an official Leno's page on the social network.
- Updates and Amendments: We may update and amend this Policy from time to time by posting an amended version on our website. The amended version will be effective as of the date it is published. We will provide prior notice if we believe any substantial changes are involved via communication means available to us or on our website. Continuing to use the Service after such notice means that you agree to the new policy.
- Children: Our Service is not designed to attract children under the age of 16. We do not knowingly collect personal information from children and do not wish to do so. If we learn that a person under the age of 16 is using the Service, we will attempt to prohibit and block such use and will make our best efforts to promptly delete any personal information stored with us regarding such child. If you believe that we might have any such information, please contact us via [privacy@jocamedia.com](mailto:privacy@jocamedia.com).
- Questions, Concerns or Complaints: If you have any comments or questions regarding our Privacy Policy, or if you have any concerns regarding your personal information held with us, please contact us via [privacy@jocamedia.com](mailto:privacy@jocamedia.com)