

Space Time Media Ltd. (aka 'Dialogue')

PRIVACY POLICY (the "Policy")

Last Updated: May 2023

Please read this Policy to learn how your information is collected, used and stored when you use the Service. If you have questions about this Policy, please email us at support@nowdialogue.com.

This Policy describes how Space Time Media Ltd. (together with its US subsidiary 'Space Time Media USA, Inc.', the "**Company**", "**we**", "**our**" or "**us**"), may collect, store, use, process and/or share your information when you use or access our website (www.nowdialogue.com) (the "**Site**"), our web-based virtual vendor and consumer behavior analytics platform (the "**Platform**" and, together with the Site, the "**Services**") or any third party website to which the Platform is connected (each, a "**Customer Site**"). Remember that your use of the Services is at all times subject to your agreement to and compliance with the applicable Terms of Use, which incorporate this Policy and may be found at the following links: (I) [Website Terms of Use](#) (the "**Website Terms**"), (II) [Platform Terms of Use](#) (the "**Platform Terms**" and, together with the Website Terms, the "**Terms**"). If you use the Services, you are deemed to have agreed to this Policy. If you do not agree to this Policy, you are not permitted to use the Services.

We are committed to maintaining the privacy of those who use the Platform ("**Platform Users**"), visitors to the Site (together with Platform Users, "**Users**", or "**you**") and those who visit Customer Sites ("**Consumers**"). This Policy explains:

- What information we collect and why we collect it.
- How we use that information.
- Your rights and Consumer's rights with regard to the collection of such information.
- Our role as a data processor of Consumers' information

1) Background & Application of this Privacy Policy

- a) *The Services.* Dialogue's Platform allows Platform Users to provide a better online shopping experience to their respective Consumers, and optimize Platform Users' sales accordingly. The Platform includes a dashboard which reflects to Platform Users the statistical analysis conducted by Dialogue and aids them in optimizing Consumer engagement and turnover rates. Dialogue is also engaged in the ideation, development, maintenance and provision of the Site which provides information about the Platform.
- b) *Applicability of this Privacy Policy to Consumer Information.* While this Policy describes Dialogue's collection, use and processing of all information collected via the Services, including from Consumer's via Customer Sites, our relationship to Users is different from our relationship to Consumers. This Policy, together with the applicable Terms, is part of a direct contractual relationship between us and Users, and governs our collection of information from Users. Dialogue does not have a direct

contractual relationship with Consumers. *With respect to Consumers, Dialogue is a data processor who processes data collected from Consumers on behalf of Platform Users, pursuant to the terms set out in the Platform Terms. With respect to Consumers, the applicable Platform User is the data controller responsible for obtaining Consumer consent for the collection and use of Consumer information.*

- c) *Your Consent to this Policy.* By accessing, registering for, or using the Services, you indicate that you understand, accept, and consent to the practices described in this Policy, and that you agree to the applicable Terms. If you have any questions about the Policy, please email us at support@nowdialogue.com.
- d) *Modifications to this Policy.* We reserve the right to revise, amend, or modify this Policy at any time by posting the modified Policy at <https://nowdialogue.com/privacy-policy>. Please review this Policy often so that you will remain updated regarding our current policies. If you are a registered Platform User, we will notify you of any changes to the Policy that we consider to be material modifications by sending an email to the email address affiliated with your account. You hereby agree that your continued use of the Services after we've posted the modified Policy at the aforementioned link or, if applicable, notified you via email of the modified Policy, indicates and constitutes your agreement to be bound by the modified Policy. If you don't agree to be bound by the modified Policy, then you may no longer use the Services.

2) Collecting Information

- a) *Automatic Information Collection via the Services.* Dialogue may automatically collect certain technical and usage information from Users when you interact with the Services including session duration, content accessed, frequency and scope of use of the Services, computer/device hardware and software information, internet connection information and other information of a similar nature.
- b) *Voluntary Personal Information Collected via the Services.* We may also request that you provide us, voluntarily, with certain information from which you can be personally identified, as part of your use of the Services, including your name, email address, job title, payment details and the location of the computer through which you use the Services. Disclosing personal information to us is required in the following circumstances:
 - **Contacting Us:** If you wish to contact us regarding our Services, we will collect your full name, email address, phone number and the subject of your inquiry to facilitate your inquiry.
 - **Subscribing to use the Platform:** If you wish to subscribe to use the Platform, we will collect your first and last name, email address, phone number and address, to enable you to subscribe to use the Platform, as well as certain business information as applicable. We will also require you to set up a username and password in order to be able to log-in to use the Platform. Platform Users will also be required to pay our fees via reputable third-party payment processors who will collect your payment information and process your payment information. We will not collect payment information directly and your provision of payment

information will be subject to the provisions of the relevant payment provider's policies.

- **Subscribing to our Newsletter:** If you wish to subscribe to our newsletter and be provided with information on the Services and special promotions, we will collect your email address in order to facilitate such subscription.

- c) *Collection of Consumer Information.* When Platform Users connect the Platform to a Customer Site, the Company will receive access to Consumer transaction information with respect to transactions that occur and/or have occurred on the Customer Site including username and contact information, shipping information and the details of the purchases. The only information that is collected, stored and processed by Company from Consumers is: (i) unique online identifiers of each Consumer, and (ii) purchase history and actions of each Consumer ("**Consumer Information**"). Such collection of Consumer Information enables us to provide Platform Users with our dashboard which displays our analyzed assessment of Consumers' interest in Platform Users' offered products and services and supports Platform Users in personalizing and optimizing their ecommerce offerings. Please note that we will secure personally identifiable Consumer Information by hashing it, and providing it our own unique identifier, to prevent Consumers from being personally identified and to protect Consumer privacy.

As mentioned above, with respect to Consumers Dialogue is a data processor who processes data collected from Consumers on behalf of Platform Users, pursuant to the terms set out in the Platform Terms. With respect to Consumers, the applicable Platform User is the data controller responsible for obtaining Consumer consent for the collection and use of Consumer information.

3) Use of Information

We may use or process your personal information or Consumer Information for the following purposes. One or more purposes may apply simultaneously.

- a) *Providing the Requested Services.* Much of the information we collect is simply used to provide the services that our Users have requested.
- We use personal information of our Platform Users to provide you with access to the Platform and provide the necessary ancillary services to enable you to derive maximum benefit from the Platform.
 - We may use personal information, when necessary, to perform our contractual obligations, such as providing Users required notice pursuant to the Terms.
 - We also use personal information provided by Users to provide you with other services requested, such as provide technical support, subscribe you to our newsletter, etc.
 - We use the Consumer Information to provide Platform Users with the content and advice contained on our Platform, enabling Platform Users to optimize and personalize their ecommerce stores for Consumers.
- b) *Improvement and Development of the Services.* We process certain personal information pursuant to our legitimate interest in improving the Services to provide Users with the best experience possible. Such processing includes:

- collecting and addressing feedback regarding the Services and communicating with Users to provide information on the use of Services quickly and easily.
 - reviewing and improving the information provided on the Services to ensure they are user friendly.
 - improving the management and administration of our business and maintaining compliancy with our internal policies and procedures.
 - conducting surveys and research, testing features in development, and analyzing the information we have to evaluate and improve our products and services, develop new features, and conduct audits and troubleshooting activities.
- c) *Maintain a Safe and Secure Environment.* We may use your information to detect and prevent fraud, abuse and security incidents, in light of our legitimate interest in improving the Services and enabling Users to browse in a secure environment. Such processing includes:
- verifying and authenticating your identity and preventing unauthorized or illegal activity;
 - enhancing the safety and security of the Services;
 - conducting security investigations and risk assessments;
 - preventing or taking action against activities that are, or may be, in breach of the Terms or applicable law.
- d) *Personalize Content, Advertising and Marketing.* Pursuant to our legitimate interest to personalize your experience and customize our content, we may process your personal information in the following ways.
- if you have used our Services in the past, we have a legitimate business interest for matching the data we collect with other data we had already collected.
 - this enables us to understand your needs and interests, optimize the content we send you and make it more suitable and relevant to your needs.
 - this also enables us to improve your experience on the Platform by providing you with personalized content, recommendations, and features.
- e) *Use of Anonymized Data & Aggregated Data.* Notwithstanding anything to the contrary in this Policy, we may use, share and sell aggregated or anonymized data either collected by us or generated from information collected by us for any purpose and without restriction including to develop, improve and commercialize products and services.

4) **Disclosure of Information and Transfer of Data**

We understand the importance of limiting the sharing of your personal information and/or Consumer Information with third parties to what is reasonably necessary for providing and improving our products and services and otherwise fulfilling the purposes for which the information is collected. We may share your personal information and/or Consumer Information in the following circumstances:

- ***Perform Our Obligations:*** In order to perform our legal and contractual responsibilities.

- ***With Developers:*** Company software and technology developers may have access to information that is related to or useful for the development and improvement of our software, algorithms, products and services.
- ***Our Service Providers:*** We may share information with contractors, services providers and other third parties we use to support Services and our products, services and business operations including marketing, data management and maintenance services.
- ***Business Transfers:*** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of our business.
- ***Affiliates:*** We may share your information with our affiliates. Affiliates include any parent company, subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.
- ***Comply with Applicable Law:*** We may share your information as required by any court order, law, legal process or government or regulatory request.
- ***Enforce Our Rights:*** We may share your information as reasonably necessary to enforce our rights arising from any contract between us and you, including the Terms applicable to you or any purchase order.
- ***Protect Us or Others:*** We may share or transfer your information if we believe it is reasonably necessary to protect the rights, property, goodwill or safety of us, our customers or other Users or Consumers.
- ***Payment Providers:*** We share your personal information with our third-party payment processors who process your payment details on our behalf.
- ***Analytics Providers:*** We may also share your information with analytics service providers for analytics services. Such analytics service providers set their own cookies or other identifiers on your computer, through which they can collect information about your usage of our Services. This helps us compile aggregated statistics about the effectiveness of our Services.
- ***Special Cases:*** We may share specific information in special cases, such as if you use the Services to perform an unlawful act or omission or if there is an attempted breach of the security of the Services.

The third parties with whom we share information pursuant to the above may be located in countries other than your own, and we may send them information we receive. We use commercially reasonable safeguards, including a variety of legal mechanisms such as contracts, to ensure your rights are protected and that your personal information remains secure and is only transferred to trustworthy third parties with privacy policies and security requirements reasonably similar to our own, and who only use such personal information for the reasons we have authorized. As an Israeli company, the primary authority supervising our activities is the Israeli Privacy Protection Authority, and you have the right to file a complaint to it or any other relevant supervisory authority.

5) **Your Rights**

You have the right at any time to request to access or modify your information. To exercise these options, please contact us at support@nowdialogue.com.

In some jurisdictions, in particular those located within the European Union (the “EU”) or within the European Economic Area (the “EEA”), you may be afforded specific rights regarding your personal information. Subject to such eligibility, you may have the rights to:

1. Request a rectification of your personal information where the information we hold about you is incorrect or incomplete.
2. Object to the processing of your personal information for direct marketing purposes.
3. Object to the processing of your personal information where our legal basis for that processing is that such processing is necessary for our legitimate interests.
4. Object to automated decision-making (including profiling) in certain circumstances.
5. Request the erasure of your personal information in certain circumstances, such as where processing is no longer necessary for the purpose it was originally collected for, and there is no compelling reason for us to continue to process or store it;
6. Receive your personal information, or ask us to transfer it to another organization that you have provided to us, which we process by automated means, where our processing is either based on your consent or is necessary for the performance of a contract with you.

Generally, with regard to Personal Information collected from Users on the Services, Dialogue is a “Data Controller”. Therefore, if you wish to exercise the above mentioned rights, please contact us, and we will make our best efforts to fulfill your request.

With respect to Consumer Information collected via Customer Sites, Dialogue is a “Data Processor.” Therefore, if you are a Consumer (aka, a user of an ecommerce store belonging to a customer of ours) for detailed information concerning the exercise of your rights, you should contact the applicable Platform User (aka, the owner of the ecommerce store which you use).

Regardless of your relationship with us, should you wish to file a request regarding any of the above, you may contact us at: support@nowdialogue.com and we will make our best efforts to facilitate your request.

6) California Online Privacy Protection Act

CalOPPA requires commercial websites and online services to post a privacy policy. The law’s reach stretches well beyond California to require any person or company in the United States (and conceivably the world) that operates websites collecting personally identifiable information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals or companies with whom it is being shared. See more at: <http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf>.

According to CalOPPA, the Company agrees to the following:

- We will include a link to this Policy on our home page or on the first significant page after entering the Site or the Platform.
- Our Policy link includes the word ‘Privacy’ and can easily be found on each page on the Services.
- You can request to change your personal information by emailing us at: support@nowdialogue.com

7) CAN SPAM Act

The CAN-SPAM Act is a Federal US law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out strict penalties for violations. In order to comply with CANSPAM, we agree that we will:

- not use false or misleading subjects or email addresses;
- identify the commercial message sent to you as an advertisement when required;
- include the physical address of our business or site headquarters;
- monitor third-party email marketing services for compliance, if one is used;
- honour opt-out/unsubscribe requests quickly.
- allow users to unsubscribe by using the link at the bottom of each email.

If at any time you would like to unsubscribe from receiving future emails, you can email us at support@nowdialogue.com and we will promptly remove you from ALL correspondence.

8) **Cookies**

We may use “cookies” and/or other technologies or files (collectively, “**cookies**”) to identify how visitors make use of our Services. This aggregated tracking information may be used to help us improve and enhance the experience for all of our visitors when using the Services. In addition, cookies are used for adjusting the Services to your personal preferences. Cookies contain information such as the pages you visited, the length of time you stayed on the Services, the location from which you accessed the Services and more. If you would prefer not to have cookies stored on your computer, you may modify your browser settings to reject most cookies, or manually remove cookies that have been placed on your computer. However, by rejecting the cookies, you may be unable to fully access the offerings on the Services. To find out more about cookies, visit www.allaboutcookies.org.

9) **Links to Other Websites**

The Services may provide links to other websites. Please be aware that these other websites are not covered by this Policy. This Policy does not cover the information practices exercised by other providers of products or services, advertisers or other websites, companies or individuals, which are not owned or controlled by the Company. We suggest that when linking to another website, you always read that website’s privacy policy before volunteering any personally identifiable information.

10) **Data Security**

We deploy industry standard measures to ensure the security, confidentiality, integrity and availability of the personal information we process. We maintain physical, technical and administrative safeguards, and test and update these periodically. We endeavor to restrict access to personal information on a ‘need to know’ basis for the provision of services to our Users or for such other purposes as set out in this Policy. No such measures are perfect or impenetrable. In the event of a security breach, we will take all reasonable action to minimize any harm. Although we will do our best to protect personal information, we cannot guarantee the security of data transmitted to us or via the Services and transmission is at your own risk.

11) **Data Retention**

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We may anonymize or aggregate your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any purpose without further notice to you or your consent and without any requirement to delete such data, which may be retained indefinitely.

12) **Children's Privacy**

The Services are not intended for children under the age of 16. We do not, knowingly or intentionally, collect information about children who are under 16 years of age.

IF YOU ARE UNDER THE AGE OF 16 YOU MAY NOT USE THE SERVICES, UNLESS PARENTAL CONSENT IS PROVIDED.

PLATFORM USERS MAY NOT ENABLE THE COLLECTION OF CONSUMER INFORMATION FROM CONSUMERS UNDER 16 YEARS OF AGE.

13) **Questions Regarding Our Privacy Policy**

If you have any questions regarding this Privacy Policy or the practices described above, you are always welcome to contact us at support@nowdialogue.com.

14) **Do Not Track Requests**

We do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online.

15) **Governing Law and Jurisdiction**

This Privacy Policy will be governed and interpreted pursuant to the laws of the State of Israel without giving effect to its choice of law rules. You expressly agree that the exclusive jurisdiction for any claim or action arising out of or relating to this Privacy Policy shall be to the competent courts in Tel Aviv, Israel, to the exclusion of any other jurisdiction.