

Privacy Policy

Fingenom Ltd. and its affiliates (“**Fingenom**”, and all references, as the context requires, to “**we**”, “**us**” or “**our**”) scope is to provide various financial solution in the traditional and cryptocurrencies markets (the “**Services**”). In doing so, we are committed to protecting personal data and information that we gather from our customers, potential customers, prospects, and other end users of our online sites and services, including fingen.co.il, permac.co.il and algoz.io and all mobile device applications, if any (the “**Websites**”).

Please read the following carefully to understand our views and practices regarding your personal information and how we will collect, store, process, disclose and use such personal information in respect of any use of the Websites and the Services. This Privacy Policy applies to all of the software, services, information, tools, features and functionality offered by us in our Websites and Services. Should we ask you to provide certain personal information when using our Services, you can be assured that it will only be used in accordance with this Privacy Policy.

IMPORTANT: BY USING THE SERVICES AND/OR THE WEBSITES, YOU GIVE YOUR CONSENT THAT ALL PERSONAL INFORMATION THAT YOU SUBMIT OR THAT IS COLLECTED THROUGH THE WEBSITES OR THE SERVICES MAY BE PROCESSED BY US IN THE MANNER AND FOR THE PURPOSES DESCRIBED IN THIS PRIVACY POLICY.

IF YOU DO NOT AGREE TO THE TERMS AND CONDITIONS SET FORTH HEREIN AND TO OUR [TERMS OF USE](#) (“Terms**”), PLEASE DO NOT USE THE WEBSITES OR THE SERVICES.**

1. General

- 1.1. Our users entrust us with information of a personal and confidential nature, and this Privacy Policy is to inform you about our practices with respect to collection, storage and processing of personal information that may be used, alone or in combination with other information, in connection with the provision of our Services and the Websites.

Accordingly, we process your personal information only for specific and limited purposes. We ask only for personal information that is adequate, relevant and not excessive for those purposes and internally to help us improve our Websites and Services and to help resolve any problems.

- 1.2. We will not collect or use personal information for purposes other than those described in this Privacy Policy, our Terms, and/or in any other legal instrument in effect between us. You can decline to submit personal information, in which case we may not be able to provide you with part or all of the Services.
- 1.3. Unless stated otherwise in this Privacy Policy, we will not share, sell, auction off or give away your personal information to any third-party or other organization without first obtaining your prior written consent.
- 1.4. This Privacy Policy forms a part of the Terms, and is incorporated thereto by reference, along with other policies which you may be notified of by us from time to time.

2. What data we collect?

- 2.1. Information you give us. You may give us information about you, including personal information, when you register and/or use our Websites or by corresponding with us by phone, e-mail, post or instant chat. You may also provide such information when you subscribe to our Services; and when you report a problem with our Websites or Services. The information you give us may include your name, address, e-mail address and phone number and other personal information. By entering the Websites and providing

information in any or all of the alternatives as specified above, you expressly consent to the terms of this Privacy Policy, and to the collection, use and disclosure of your information, including personal information, in accordance with the terms of the Privacy Policy.

- 2.2. Information we collect about you. When you visit or use our Websites, we may automatically receive and record information from your device and browser, including your cookie information, your country, regional and language settings, device model, operating system, mobile carrier and software and hardware attributes.

In addition, we may automatically collect and store the following information for statistical purposes: technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Websites (including date and time); page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the Websites.

The aforesaid information does not identify you personally, it simply enables us to compile statistics about our visitors and their use of the Websites. When you use the Websites, our servers record information (“**Log Data**”), including information that your browser automatically sends whenever you visit a website. Log Data includes your Internet Protocol address, the address of and activity on websites you visit that incorporate service features, searches, browser type and settings, the date and time of your request, how you used the websites, cookie data and device data.

Furthermore, the Websites contain hyperlinks to other pages and features on the Websites. We may use technology to track how often these links are used and which pages and features of the Websites our visitors choose to view. This technology does not identify you personally it simply enables us to compile statistics about the use of these hyperlinks.

- 2.3. Information we receive from other sources. We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, lead generation agencies) and may receive information about you from them.

- 2.4. Cookies. We use cookies on the Websites. We use them for the following main purposes:

- to associate each of the pages that you visit on our Websites with each other and thereby allows us to present the correct information to you;
- to keep you signed in to our Websites and ensures the content you are viewing is secure;
- to maintain your personal preferences.

Additionally, we use some cookies from Google. These helps facilitate and measure the effectiveness of advertisements and web searches. We may also use web beacons via the Services to collect information. Web beacons or “gifs”, are electronic images that may be used in our Services or in our emails. We may use web beacons to deliver cookies, count visits and to tell if an email has been opened and acted upon.

By using our Websites and/or Services, you agree to us placing these sorts of cookies on

your device and accessing them when you visit the Websites in future. If you prefer, it is possible to block some or all cookies, or even to delete cookies that have already been set; but you need to be aware that you might lose some functions of that Websites and/or Services.

Please be aware of our [Cookie Policy](#), which sets out information about the cookies on the Websites

- 2.5. User communications. When you send email or other communication to us, we may retain those communications in order to process your inquiries, respond to your requests and improve our Websites and/or Services. We may send you push notifications to offer you special updates in respect of the Services. You should be able to opt-out of these notifications at the device level. We may also send you newsletters and promotional communications if you joined our mailing list, you may opt-out of this service at any time by clicking UNSUBSCRIBE at the bottom of each email or by submitting a request to: aviv.h@fingen.co.il. Providing any means of contact with you (including by telephone) constitutes your consent for us to contact you by such way for the purposes outlined in this Privacy Policy.

3. Information Security

- 3.1. The security of your personal information is important to us. We follow generally accepted industry standards to protect the personal information submitted to us, including against unauthorized access to or unauthorized alteration, disclosure or destruction of personal information. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.
- 3.2. We limit access to personal information about you to employees, contractors and service provider who we believe reasonably need to come into contact with that personal information. These individuals are bound by confidentiality obligations.
- 3.3. Although we cannot guarantee against any loss, misuse, unauthorized disclosure, alteration or destruction of data, we try to prevent such unfortunate occurrences, including by implementing corporate procedures in this regard.

4. Third Party Sites and Services

- 4.1. To improve our ability to provide you with the Services, we may combine your personal information with aggregated data about groups of people in similar circumstances. Furthermore, we sometimes supplement the information that you provide with information that is received from third parties.
- 4.2. We may use a reputable third party to present or serve advertisements that you may see on the Websites. These third-party ad servers may use cookies, clear gifs or similar technologies to help present such advertisements, and to help track, measure and research the advertisements' performance and effectiveness. Furthermore, we may enable trusted data partners to collect non-personal information, by deploying certain collection technologies within the Websites, including, but not limited to, for purposes such as statistics aggregation, to improve the Websites or to improve the Services. The use of these technologies by these third-party ad servers is subject to their own privacy policies and is not covered by our Privacy Policy.
- 4.3. This Privacy Policy does not apply to the practices of companies that we do not own or control, or to individuals whom we do not employ or manage, including any of the third parties to which we may disclose information as set forth in this Privacy Policy. The Websites may also enable you to interact (whether directly or through link) with third party websites, social media, widgets, mobile software applications and 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 these Third-Party Services. Please be aware that the Third-Party Services may collect personal information from you. Accordingly, we encourage you to read the terms and conditions and privacy policy of each Third-Party Service that you choose to use or interact with.

- 4.4. By providing any personal information to us pursuant to this Privacy Policy, all users, fully understand and unambiguously consent to this Privacy Policy and to the collection and processing of such personal information in Israel and abroad. The server on which the Websites and the Services are hosted and/or through which the Websites and the Services are processed may be outside the country from which you access them and may be outside your country of residence. Some of the uses and disclosures mentioned in this Privacy Policy may involve the transfer of your personal information to various countries around the world that may have different levels of privacy protection than your country.

5. Non-Personal Information

We may use or share non-personal information (such as information which does not enable identification of an individual user or aggregated information) in any of the above circumstances, as well as for the purpose of providing and improving the Websites and/or the Services, aggregate statistics and conduct business and marketing analysis, and enhance your experience with the Websites and/or the Services. If we combine personal information with non-personal information, the combined information will be treated as personal information for as long as it remains combined.

6. Minors

We care about the safety of children. Therefore, the Websites and/or the Services are not directed towards children who have not reached the age of legal majority in their jurisdiction. Specifically, that is the age at which an individual is recognize by the applicable law to be an adult and responsible for any legal obligations created by his or her actions. We do not knowingly contact or engage with children without said parental consent (or consent from their legal guardian). By using the Websites and/or the Services, you affirm that you have reached the age of legal majority in your jurisdiction.

7. Enforcement

We regularly review our compliance with this Privacy Policy. Please feel free to direct any questions or concerns regarding this Privacy Policy or our treatment of personal information by contacting in accordance with the “Contacting Us” section below. When we receive formal written complaints, it is our policy to contact the complaining user regarding his or her concerns.

8. Updates to this Privacy Policy

We may update this Privacy Policy from time to time without prior notice, by posting amended Privacy Policy on the Websites. We encourage you to periodically review this Privacy Policy for the latest information about our privacy practices. Any changes to this Privacy Policy will become effective on the next business day following posting the revised Privacy Policy on the Websites. Your use of the Websites and/or Services following these changes means that you accept the revised Privacy Policy.

9. Contact us

If you have any questions about this Privacy Policy, please feel free to contact us at alon.k@fingen.co.il.
