

## United States Privacy Notice

### Commbbox

Effective Date: Aug 1st, 2023

This United States Privacy Notice (“**Notice**”) supplements our [Privacy Policy](#). It includes information required under U.S. privacy laws such as California law, including Title 1.81.5 of the California Civil Code (the “**California Consumer Privacy Act**”), California Privacy Rights Act of 2020, and other U.S. states privacy laws such as Virginia Consumer Data Protection Act, Colorado Privacy Act, Connecticut Data Privacy Act, the Utah Consumer Privacy Act (“**U.S Privacy Laws**”), and describes the rights available to you if you are a resident of other states as may be applicable.

We may update this Notice at any time and such changes will apply from the time we publish or otherwise notify you of the updated Notice.

As used in this Notice, the term “**Personal Information**” does not, unless stated otherwise, include information made publicly available from federal, state or local government records, or consumer information that is de-identified or aggregate consumer information. Any undefined but capitalized term in this Notice has the meaning given to it in the Privacy Policy.

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### A. OUR DATA PRACTICES

#### 1. Categories of Information we Collect and With Whom it is Shared

In the last 12 months we have collected and shared the following categories of personal information for our business purposes or in a manner which may be deemed a “sale” under U.S Privacy Laws:

Category of Personal Information	Description	Categories of third parties with whom Personal Information was shared (for our business purposes)	Categories of third parties with whom we have shared personal information in a manner which may constitute a “Sale” under applicable U.S Privacy Laws
A. Identifiers	We collect identifiers such as a real name, alias, company and job title, postal address, online identifiers, unique personal identifiers (such as case device identifiers, MAC address, LAN MAC address, IP address, cookies), email address, account name, telephone numbers, zip code or other similar identifiers.	<ul style="list-style-type: none"><li>• Cloud and hosting service providers;</li><li>• Communication services providers;</li><li>• Our business partners with whom you contact;</li><li>• Data analytics providers;</li></ul>	<ul style="list-style-type: none"><li>• Data analytics providers, such as Google Analytics and Meta platforms which may use information they collect and analyze on our behalf for their own purposes;</li></ul>

		<ul style="list-style-type: none"> <li>• Network security providers.</li> </ul>	
<p><b>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</b></p>	<p>Personal information which can be related or associated with any particular person such as a name, description, address, telephone number, bank account number, credit card number, debit card number, or any other related financial information that you provide, other than information that is lawfully made available to the general public from federal, state, or local government records.</p>	<ul style="list-style-type: none"> <li>• Internet service providers;</li> <li>• Payment processors;</li> <li>• Communication services providers;</li> <li>• Our business partners with whom you contact.</li> </ul>	<ul style="list-style-type: none"> <li>• Payment processors and communication service providers, who may use such information in a manner which may constitute a “sale” under applicable U.S Privacy Laws, such as for transactional purposes.</li> </ul>
<p><b>C. Protected classification characteristics under California or federal law.</b></p> <p><b>(if applicable)</b></p>	<p>Information that can be used to characterize a protected class of individuals under California or U.S. federal law, such as a person’s race, color, religion or creed, national origin or ancestry, sex (including pregnancy, childbirth, breastfeeding and related medical conditions), gender identity and expression, age (whether the person is 40 or older), physical or mental disability, military or veteran status, genetic information, citizenship, medical conditions (including genetic characteristics, cancer or a record or history of cancer), political activities or affiliations, whether a person is a victim of domestic violence, assault, or stalking, Request for family care leave, requests for leave for an employee’s own serious health condition, for pregnancy disability leave, reporting patient abuse in a tax-support institution.</p>	<ul style="list-style-type: none"> <li>• Communication services providers;</li> <li>• Our business partners with whom you contact.</li> </ul>	<ul style="list-style-type: none"> <li>• Our business partners with whom you contact may use such information in a manner which may constitute a “sale” under applicable U.S Privacy Laws for the purpose of rendering their services to you.</li> </ul>
<p><b>D. Commercial information.</b></p>	<p>Commercial information including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p> <p>This includes products and services you have purchased from us</p>	<ul style="list-style-type: none"> <li>• Payment processors;</li> <li>• Communication services providers;</li> <li>• Social media;</li> <li>• Our business partners with whom you contact.</li> </ul>	<ul style="list-style-type: none"> <li>• Payment processors and our business partners, who may use such information in a manner which may constitute a “sale” under applicable U.S Privacy Laws, such as to identify fraud or for transactional purposes.</li> </ul>

<p><b>E. Biometric information.</b> <b>(if applicable)</b></p>	<p>Physiological, biological, or behavioral characteristics (including DNA) that can be used, alone or with other each other or other identifying data, to identify an individual. Biometric information includes, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.</p>	<ul style="list-style-type: none"> <li>• Our business partners with whom you contact.</li> </ul>	<ul style="list-style-type: none"> <li>• Our business partners with whom you contact may use such information in a manner which may constitute a “sale” applicable U.S Privacy Laws for the purpose of rendering their services to you.</li> </ul>
<p><b>F. Internet or other similar network activity.</b></p>	<p>Internet or other similar network activity, including browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.</p> <p>We collect such information in two ways: (A) when you visit and use our website, and (B) when we preform our services, which involves scanning your networks and devices. When we perform such scans we may receive such data, though we do not specifically search for it.</p>	<p><i>A. Information collected on our website:</i></p> <ul style="list-style-type: none"> <li>• Internet service providers;</li> <li>• Data analytics providers;</li> <li>• Communication services providers.</li> </ul>	<p><i>A. information collected on our website:</i></p> <ul style="list-style-type: none"> <li>• Data analytics providers, such as Google Analytics which may use information they collect and analyze on our behalf for their own purposes;</li> </ul>
		<p><i>B. Information collected when we provide services:</i></p> <ul style="list-style-type: none"> <li>• Internet service providers;</li> <li>• Communication services providers.</li> </ul>	<p><i>Information collected on our platform:</i></p> <p>Data analytics providers and communication service providers, such as Facebook and WhatsApp which may use information they collect and analyze on our behalf for their own purposes;</p>
<p><b>G. Geolocation data.</b></p>	<p>Physical location or movements, including approximate location derived from IP address, postal address, and physical location of a network.</p>	<ul style="list-style-type: none"> <li>• Internet service providers;</li> <li>• Data analytics providers;</li> <li>• Communication services providers.</li> </ul>	<ul style="list-style-type: none"> <li>• Data analytics providers, such as Google Analytics and may use information they collect and analyze on their behalf for their own purposes;</li> </ul>
<p><b>H. Sensory data.</b></p>	<p>Audio, electronic, visual, thermal, olfactory, or similar information.</p>	<ul style="list-style-type: none"> <li>• Our business partners with whom you contact.</li> </ul>	<ul style="list-style-type: none"> <li>• Our business partners with whom you contact may use such information in a manner which may</li> </ul>

			constitute a “sale” under applicable U.S Privacy Laws for the purpose of rendering their services to you.
<b>I. Professional or employment-related information.</b>	Information related to a person’s profession or employment, such as the person’s profession, current or past job history/employers or performance evaluations.	<ul style="list-style-type: none"> <li>• Our business partners with whom you contact.</li> </ul>	<ul style="list-style-type: none"> <li>• Our business partners with whom you contact may use such information in a manner which may constitute a “sale” under applicable U.S Privacy Laws for the purpose of rendering their services to you.</li> </ul>

**2. Sources of Personal Information**

The categories of sources from which we collect the personal information described above are:

- Third-Party communication solution providers and resellers of our services.
- From our users when they access and use our Website and/or Services, submit information or permit us to access their networks or devices;
- Data analytics providers we or you engage and provide us information, such as cookies.

**3. Purpose of Collection of Information**

Our business or commercial purposes for collecting personal information are:

- To provide our products and service to you or perform our agreement with you.
- For the reason you provided the information. For example, if you contact us with an inquiry and share your name and contact information, we will use that personal information to respond to your inquiry.
- To provide, support, personalize, develop and improve our website, products and services.
- To communicate with you about our products, services and related issues.
- To allow you to register for the Services and to administer and process the registration, to trouble shoot, provide support and contact you in connection with your account.
- To prevent fraud, misappropriation, infringements, identity thefts and any other misuse of the Services and any security breaches or other potentially prohibited or illegal activities.
- To evaluate the quality of our products and Services, and to enhance your experience on our site/application.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding.

**4. Recipients of Personal Information**

In addition to sharing information with the categories of third parties listed in the table above, we may also, share information of any category:

- Legal counsel and professional advisors, courts, tribunals, and other entities for the purpose of resolving a dispute, defending against a claim or enforcing our rights;

- To an acquirer of our business or the relevant portion of our business, or in case of a merger, to the surviving company.
- With law enforcement or government agencies when required to do so by applicable law or in order to prevent harm to you or any third party or the public;
- When person to whom the data relates has consented or requested that we do so.

## **5. Sale of Personal Information**

We do not sell personal information for money. However, in some cases, sharing personal information may be deemed a “sale” under applicable U.S Privacy Laws. The categories of personal information we share which may be deemed a “sale” under applicable U.S Privacy Laws are listed in the table above. When we share this personal information, we do so in the context of receiving services from the third parties for the purposes listed in Section 3 above. For example:

- We use data analytics providers like Google Analytics to collect information about our users and visitors so we can monitor and improve our website. They may use this information they receive for their own purposes.
- When you share information with our business partners, they may use such information for the purpose of your communication with them, or for any other reason our business partners collect and keep information for. We recommend you review our business partners' privacy policies to learn of their usage and record of Privat Information.

You can direct us not to “sell” your personal information as such term is defined in the CCPA by clicking [here](#). Please be aware that if you make such a request, we may not be able to provide certain or all of our products and services.

## **B. YOUR U.S PRIVACY RIGHTS**

### **1. Your Rights under U.S Privacy Laws**

Under applicable U.S Privacy Laws, you may have the right to:

- Request information about the categories and specific pieces of personal information that we have collected in the last 12 months.
- Request to correct inaccurate personal information that we have collected about you.
- Request to receive a copy of your personal data that we have collected.
- Request that we delete personal information that we have collected from you. However, certain exceptions specified in law may apply and in such cases we are not required and may not comply with your request. This includes when we need the information in order to:
  - Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall in accordance with federal law, provide a good or service requested by you or reasonably anticipated within the context of a business’ ongoing business relationship with the consumer, or otherwise perform a contract with you;
  - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
  - Debug to identify and repair errors that impair existing intended functionality;
  - Exercise free speech, ensure the right of another consumer to exercise that consumer’s right of free speech, or exercise another right provided for by law;
  - Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code;
  - Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the business’ deletion of the information is likely to render impossible or seriously impair the achievement of such research, if the consumer has provided informed consent;

- Enable solely internal uses that are reasonably aligned with expectations based on our relationship with you;
  - Comply with a legal obligation; or
  - Otherwise use the information, internally, in a lawful manner that is compatible with the context in which you provided the information.
- Request disclosure of the categories and specific pieces of personal information we collect about you, the categories of sources from which it is collected, the business or commercial purposes for which we collect personal information, and the categories of third parties with whom we share personal information, all in the last 12 months.
  - Request disclosure of the categories of personal information we have sold or shared about you and the categories of third parties to whom we have we sold or with whom we have shared such personal information in the last 12 months.
  - Direct a business that sells personal information about you to third parties not to sell or share your personal information or to limit the use of your sensitive personal information.
  - Not be discriminated against for making these requests, such as by being denied goods or services, receiving worst rates or prices, receiving worse quality of goods or services, and we will not engage in any such discrimination.
  - Request to opt-out of the processing of your personal information for sale, targeting advertising, or profiling.
  - Request to appeal regarding our denial of any of your requests in connection to your rights. The appeal shall be submitted within a reasonable time. We will inform the you in writing of any action taken or not taken, including a written explanation. within 45-60 days, as applicable under the relevant U.S Privacy Laws, of receiving your appeal. If your appeal will be denied, we will provide you with an online mechanism, if available, or other method through which you may contact the Attorney General to submit a complaint.

You may make any of the requests by submitting a request in one of the following ways:

- E-mail us at [info@commbbox.com](mailto:info@commbbox.com);
- Contact us by mail at: Beit Hakshatot, Gilil-Yam, Israel46905;
- If you are a California resident, you can submit your request through our California Privacy Rights Request Form available [here](#).
- If you are a resident of a U.S state other than California, please e-mail us your request together with your full name, address, and contact information.

You will need to provide sufficient information for us to locate Personal Data which relates to you and to verify your identity. This includes: your phone number, e-mail address and your postal code. We may request additional information to verify your identity.

If you do not provide all the requested information or information sufficient for us to verify your identity, we will not be able to fulfill your request.

You may also make such requests through an agent you authorize for such purpose, but such agent must include a written document of your authorization. We may contact you directly to verify this authorization.

## **2. Disclosure of Sharing for Others' Direct Marketing Purposes ("Shine the Light")**

In addition to the above, if we have an established relationship with you now or in the past 18 months, and you have shared with us certain personal information which at the time it was disclosed could be used to identify, describe or be associated with you, then once per year you may request a list of certain categories of personal information disclosed by us to third parties for their direct marketing during the preceding calendar year, the names of such third parties, and if the nature of

the parties' businesses is not reasonably clear from their names, examples of the products or services marketed by such third parties.

The types of categories which must be disclosed according to such a request are listed in California Civil Code Section 1798.83 and include name, address, age, email address, race, religion, certain physical or health information, certain financial information, and other information listed in the statute.

You may request this information by e-mailing us at [info@commbox.com](mailto:info@commbox.com).

This right only applies if our relationship is primarily for your personal, family or household purposes and related to the purchase of our products and services.

### **3. Limitations on Rights**

With respect to all requests made as described above, we will fulfill and disclose information to the extent required by applicable law. In addition to the limitations on your right to request the deletion of data as described above, other exceptions and limitations in applicable U.S Privacy Laws and federal law may apply.

Furthermore, if you do not provide us with the information requested or sufficient information to fulfil your request, your request may not be fulfilled.

In case you are uncertain regarding the rights applicable to you, please e-mail us your quarry to [info@commbox.com](mailto:info@commbox.com) together with your full name, address, and contact information.

### **C. CALIFORNIA DO NOT TRACK NOTICE**

We do not track individuals' online activities over time and across third-party websites or online services (though we do receive information about the webpage you visited prior to accessing our websites, online services products and advertisement landing pages). We do not permit third-parties to track individuals' online activities on our website and online services, unless it is part of a service provided to us. For example, we use data analytics providers to provide analytics services and collect data about the use and access of our website. We do not respond to Web browser "do not track" signals or similar mechanisms.