### **Proginter - Privacy Policy**

### 1. Platform Owner and Database Controller Details:

Name – Proginter Ltd
Email Address – support@proginter.com
https://proginter.com/
Mailing Address – Rothchild 57, Petah Tikva

2. We respect the privacy of users. Therefore, we have chosen to publish a clear and transparent privacy policy, and we are committed to adhering to it. The purpose of this document is to explain how we manage user privacy. Among other things, we will explain what information is collected, how we use it, and what rights you have regarding this information.

This privacy policy complies with the provisions of Section 11 of the Protection of Privacy Law, 1981.

This document is written in the masculine form for convenience only, but it is intended for all genders.

We recommend reading the privacy policy carefully. Continued use of the platform constitutes confirmation that you have read, understood, and agree to this policy. If you do not wish your information to be collected in accordance with this policy, please refrain from using the platform.

You are not legally required to provide your details, but note that providing certain information may be a condition for full access to the platform's content, services we offer, or making purchases.

#### 3. Information We Collect on the Platform

When using the Platform's services, information about you is collected, some of which may personally identify you:

- Contact information, such as your name, email address, phone number;
- Information you provided in correspondence and/or communication with the platform;
- Information you provided about the offers and services that interested you;
- Use of cookies and/or pixels, some of which may personally identify you;

• Information about purchases made on the platform.

Some of the collected information does not personally identify you, such as:

- The browser type you are using to access the site;
- The type of device you are using;
- Platform usage and browsing data time spent on each page, pages visited, actions performed;
- Products you showed interest in;
- User preferences such as preferred language.

By virtue of the services provided to you, the platform owner has permission to access the materials you store. However, it is clarified that the platforms owner will not access the materials and/or content unless permission is given by the user.

After the termination of the relationship between the user and the service, the content and/or materials will be deleted.

When you create an account, we collect and retain certain personal details you provide, such as your full name, company name and registration number, email address, phone number, country of residence, and account password. These details are kept securely in order to operate your account and provide the services. Unlike content you may choose to store or upload through the service, these account details are not subject to deletion.

#### 4. Information Collection

The data collected, as well as any content uploaded and/or shared and/or created by the user on the platform, will be stored by the platforms owner. The databases are stored on hosting servers. The user declares that they consent to the storage of information on these servers, which may be located in Israel or abroad.

### 5. Purposes of Collecting and Using Information

The use of the collected information will be in accordance with this privacy policy or applicable legal provisions, in order to:

- Provide and enable services as specified on the platform;
- Providing storage, backup and technical support services;
- Improve the services and content offered on the platform, modify or cancel them;
- Communicate with you and respond to your inquiries;

- Enable purchases and the provision of products and services;
- Send and publish marketing content and for making contact;
- Personalize advertisements shown to you on the platform to match your interests;
- Enforce rules and procedures as specified in the Terms of Use;
- For monitoring purposes including security, fraud prevention, and detecting illegal use of the platform.

# 6. Legal Basis for Information Processing

We will process your personal information, including sensitive information, only when we have a legal basis to do so. The legal bases for processing include:

We have obtained your explicit consent to process the data;

and/or

The processing is permitted under applicable law.

## 7. Messaging and mailing

The platforms owner wishes to update users regarding important updates, developments, and other relevant matters related to the platform and its services. To ensure continuous and updated communication, the owner may send notifications to users.

In addition, the owner may send you, from time to time, newsletters or other messages by email, SMS, WhatsApp, or other digital means, regarding services and products as well as marketing and promotional information.

Such messages will only be sent with your explicit consent, and you may revoke your consent and unsubscribe at any time.

We will not share your personal information with advertisers. However, we may share statistical information about user activity on the platform and in newsletters with third parties.

### 8. Sharing Information with Third Parties

The platform owner will not transfer your personal information or activity data to third parties except in the following cases:

 Name and email address are shared with the platform's mailing system provider;

- If you purchase products or services through the platform, the necessary information will be provided to third parties to complete the purchase and/or delivery;
- Some platform services are provided by third parties who have their own terms of use and privacy policies;
- Some information is shared with the provider who supplies hosting services to the platform;
- Information about your usage and activity on the platform is transferred
  to marketing platforms such as META and GOOGLE via cookies and/or
  pixels. The platform may also share general statistical information,
  which is not personal or identifiable, about usage of the site, such as
  the total number of visitors and domain names of internet providers
  used by visitors;
- In case of a legal dispute between you and the business that requires disclosure of your details;
- If you perform actions on the platform that are contrary to the law;
- If a court order is received requiring the disclosure of your information to a third party;
- In the event of business transfers, mergers, etc.: in case of a merger, acquisition, or asset transfer, your personal information may be transferred to a third party as part of the transaction, provided the acquiring entity assumes this privacy policy.

### 9. Cookies

A cookie is a code used for authentication, tracking browsing data, and storing user information. Each cookie is created by a server and sent to the user's browser; your browser stores cookies in your computer or device's memory.

The platform uses cookies for its ongoing and proper operation, including to collect statistical data about usage, verify details, personalize the site to your preferences, and for information security purposes.

Modern browsers include options to block cookies and delete existing ones. If you do not know how to do this, refer to your browser's help section.

The site may use three types of cookies:

**Essential cookies**: required for the platform to function properly (e.g., login access).

**Performance cookies**: used to analyze platform usage (e.g., Google Analytics). **Advertising cookies**: provide personalized ads for users.

### 10. Data Security

The platform implements current systems and procedures for data security. While these systems and procedures reduce the risk of unauthorized access, they do not provide absolute protection. Therefore, the platforms owner does not guarantee that the platform and its services are fully immune from unauthorized access to stored information, and the user acknowledges and agrees to this

### 11. Data Subject Rights

### Right of review -

Under the Protection of Privacy Law, 1981, every person is entitled to review information held about them in a database.

### Right to correction -

A person who reviews the information and finds it inaccurate, incomplete, unclear, or outdated may contact the database owner to request correction or deletion.

Inquiries regarding these rights should be directed via the contact methods listed above.

### 12. Reporting Privacy Violations

If you believe your privacy has been violated in connection with the platform, please contact the platform owner and provide the relevant details. If you have questions or concerns about the processing of your personal data, or if you wish to exercise your rights, the owner will respond within a reasonable time and provide the necessary information. You may contact the owner using the contact information at the beginning of this document.

### 13. Changes to the Privacy Policy

We regularly review and update our privacy policy to ensure it reflects our current data practices. Any updates will be clearly communicated to you, and we will obtain your consent where required by law.

This privacy policy was last updated on: 02/09/2025