



# INSIGHTEC Website Privacy Policy

Last Revised: September 16, 2020

INSIGHTEC Ltd. (“INSIGHTEC”, “We” or “Us”) is committed to protecting the privacy of information that users (“User” or “You”) of its website at [www.insightec.com](http://www.insightec.com) and other websites owned, operated, licensed or controlled by INSIGHTEC Ltd. (collectively, the “Site”). This privacy policy (“Privacy Policy”) explains the types of information we may collect from Users, why we collect it, and with whom we may share it. It also describes how we protect your personal information and how you can contact us with any questions or requests. This Privacy Policy applies to information we collect from Site visitors as well as information we may gather outside this Site, such as through mobile applications, social media and written correspondence with INSIGHTEC.

## 1. Applicability of this Privacy Policy (PLEASE READ CAREFULLY!)

By entering, connecting to, accessing or using the Site, the terms and conditions set forth in this Privacy Policy and our Terms of Use, incorporated herein, apply to you. If you do not agree to any term provided herein, please do not access or use the Site.

## 2. Information We Collect

We collect two types of data and information from our Users: Non-Personal Information and Personal Information.

- **Non-Personal Information:** One type of information is non-identifiable web usage information (“Non-Personal Information”) which we collect through your use of the Site. Non-Personal Information which we collect includes information about your browser type and language, referring and exit pages and URLs, visit date and time, amount of time spent on particular pages, sections of the Site visited, and other information about how you navigate on our Site. Non-Personal information may be collected using various technologies, such as cookies, in accordance with our Cookie Policy, web beacons and/or third party web analytic tools, to analyze website traffic. We aggregate Non-Personal Information to better understand how visitors use our Site and to improve it. We may also disclose anonymized aggregated user information to third parties for lawful purposes.
- **Personal Information:** The second type of information we collect is individually identifiable information, such as name, email address, and telephone number (“Personal Information”). We collect Personal Information when:
  - A User chooses to provide Personal Information in the Contact Us Form or a similar form on the Site. Personal Information collected in these forms includes the User’s full name, country, e-mail address, phone number (optional), any text the User voluntarily writes in the “message” box, and other Personal Information provided by a User in a Site form.
  - A User provides his/her name, e-mail and company name when he/she requests to download articles or brochures from the Site.

When you voluntarily submit your Personal Information to us through a Site form, you will separately be asked to consent to INSIGHTEC’s collection and use of the information that you submit so that INSIGHTEC may respond to your inquiry or request.

The only Personal Information we collect automatically from all Users of the Site is IP address (or media access control (“MAC”) address, as applicable). We use this Personal Information as described below.

### 3. How We Use and Share the Information

- Non-Personal Information. We use the Non-Personal Information we collect to operate the Site, for statistical and research purposes relating to use of our Site, for customization and improvement of our Site (e.g. enhancing the Users' experience by analyzing trends and Users' preferences in using the Site and updating the Site to better align with Users' preferences) and to help tailor future commercial services.
- Personal Information. We use the Personal Information we collect to:
  - Contact Users to provide technical assistance and support.
  - Provide Users who subscribe to our newsletters with INSIGHTEC updates and news
  - Provide Users with a copy of their information submitted in a Site form (e.g., a User who completes a quiz receives an email copy of his/her quiz responses).
  - Determine general geolocation information (i.e., country) from which the User's computer is connected to the Internet in order for us to provide tailored content (e.g., Users in the United States see information about products available in the United States) as well as in order to safeguard our Site.
  - Verify the User's identity for the purpose of dealing with inappropriate interactions with the Site.
- We share Personal Information with third parties in the following circumstances:
  - To determine general geolocation information (i.e., country) from which the User's computer is connected to the Internet in order for us to provide tailored content (e.g., Users in the United States see information about products available in the United States) as well as in order to safeguard our Site.
  - To verify the User's identity for the purpose of dealing with inappropriate interactions with the Site.
  - To collect, hold, store and/or manage your Personal Information through INSIGHTEC's authorized third party service providers (including, as applicable, their affiliates as necessary to provide us with the requested services), as necessary to operate the website and comply with this Privacy Policy.
  - To comply with applicable law, regulation, legal process, subpoena or governmental request.
  - To enforce this Privacy Policy and/or the Terms of Use, including investigation of potential violations thereof
  - To detect, prevent, or otherwise address fraud, security or technical issues related to the Site.
  - To respond to claims that any content available on the Site violates the rights of third parties.
  - To protect the rights, property, or personal safety of INSIGHTEC, its Users, or the general public.

When INSIGHTEC is undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of its assets.

  - Pursuant to your explicit approval prior to the disclosure.

### 4. Deletion or Modification of Personal Information

If for any reason you wish to delete or modify your Personal Information, please send us an e-mail with adequate detail of your request to [dataprivacy@insightec.com](mailto:dataprivacy@insightec.com), and we will make reasonable efforts to modify or delete any such Personal Information pursuant to any applicable privacy laws. Note that, unless you instruct us otherwise, we may retain your Personal Information for as long as reasonably required for

the purposes for which such Personal Information was collected, including without limitation, for future analytics and analysis, in order to comply with our legal or business requirements or obligations, to resolve disputes, or to enforce this Privacy Policy and our Terms of Use, all as permitted under any applicable privacy laws.

## 5. Minors

We do not knowingly solicit, collect or use Personal Information from children under the age of thirteen (13). We reserve the right to request proof of age at any stage so that we can verify that minors under the age of thirteen (13) are not using the Site. If we learn that we collected Personal Information from children under the age of thirteen (13), we will endeavor to delete that information as quickly as possible. Please contact INSIGHTEC at: [dataprivacy@insightec.com](mailto:dataprivacy@insightec.com) if you have reasons to suspect that INSIGHTEC collected Personal Information from children under the age of thirteen (13).

## 6. Security

We implement commercially reasonable administrative, technical, physical and organizational security measures to maintain the security and integrity of our Site and User Personal Information and protect against loss, misuse, or improper access through generally accepted industry standard technologies and internal procedures. Please note, however, that there are inherent risks in transmission of information over the Internet or other methods of electronic storage, and we cannot guarantee that unauthorized access or use of your Personal Information will never occur.

## 7. Third Party Service Providers

We may use third party software or service in order to collect, store and/or process the information detailed herein. INSIGHTEC makes commercially reasonable efforts to engage with third parties that adhere to applicable law and an adequate privacy policy governing their collection, processing and use of non-personal and personal information. However, INSIGHTEC does not control such third party service providers.

## 8. Tracking Technologies

When you access or use the Site, INSIGHTEC may, and may allow authorized third party service providers to, place or use industry-wide technologies such as cookies and/or other tracking technologies ("Tracking Technologies"), in accordance with applicable laws. Such Tracking Technologies are stored on your computer or other device used to access the Site. Tracking Technologies may enable, inter alia, automatic activation of certain features, and make your experience and usage simpler and more convenient. For more information about our use of Tracking Technologies, please see INSIGHTEC's Cookie Policy.

## 9. International Data Transfer

We may transfer information collected about you, including Personal Information, to affiliated entities, or to other third party service providers (as provided herein) across borders and from your country or jurisdiction to other countries or jurisdictions around the world, as permitted by applicable laws. Please note that we may transfer such information to a country and jurisdiction that does not have the same data protection laws as your jurisdiction. With respect to Personal Information about individuals in the EU, INSIGHTEC transfers such Personal Information to Israel and, for such transfers, relies on the fact that the European Commission has determined that Israel provides adequate safeguards for protection of Personal Information.

## 10. Direct Marketing

On our Contact Us page, you may choose to receive company news, newsletters, product announcements and such, informing you of certain updates or about our new products or services. You will separately be asked on the Contact Us page to consent to our collection and use of your e-mail address so that we can send you such information, if you so choose. You may withdraw your consent at any time by sending a written notice to INSIGHTEC by e-mail to the following e-mail address: [dataprivacy@insightec.com](mailto:dataprivacy@insightec.com). You also may object to our processing of your Personal Information for direct marketing purposes at any time by sending a written notice to INSIGHTEC at that same email address, and we will cease processing your Personal Information for those purposes upon receipt of your objection. INSIGHTEC does not share email addresses with third parties for third parties' direct marketing activities.

Consistent with California law, INSIGHTEC does not disclose Personal Information to third parties for third parties' direct marketing purposes. California residents who have questions regarding this law and INSIGHTEC's compliance with it may contact us as set forth below.

## 11. Changes to the Privacy Policy

INSIGHTEC reserves the right to change this Privacy Policy at any time, without prior notice, to reflect technological advancements, legal changes, and/or good business practices and will make reasonable efforts to notify Users of changes. If INSIGHTEC changes its privacy practices, a new Privacy Policy will reflect those changes and date that the Privacy Policy was last revised will be noted herein. This Privacy Policy was last revised on September 16, 2020 and is effective as of that date.

## 12. Information for Individuals in the EU

In addition to all of the foregoing provisions of the Privacy Policy, the following additional terms apply to Users in the European Union (EU):

- INSIGHTEC is the "data controller" (the entity that determines the purposes and means of processing your personal data) of the Personal Information you share on the Site, and INSIGHTEC can be contacted at [dataprivacy@insightec.com](mailto:dataprivacy@insightec.com). INSIGHTEC's Data Protection Officer can also be contacted at [dataprivacy@insightec.com](mailto:dataprivacy@insightec.com).
- VeraSafe has been appointed as INSIGHTEC's representative in the EU for data protection matters, pursuant to Article 27 of the EU's General Data Protection Regulation. VeraSafe can be contacted in addition to or instead of INSIGHTEC on matters related to the processing of Personal Information. To make such an inquiry, please contact VeraSafe using this contact form: <https://www.verasafe.com/privacy-services/contact-article-27-representative> or via telephone at: +420 228 881 031. Alternatively, VeraSafe can be contacted at: VeraSafe Netherlands BV, Keizersgracht 391 A, 1016 EJ Amsterdam, The Netherlands.
- As described above, when you share your Personal Information on the Site, it is for the purposes of providing information you request (such as responses to your questions and newsletters/updates) and other purposes described in this Privacy Policy. The uses of your Personal Information are based upon your consent, and, with respect to collection and use of your IP address, INSIGHTEC's legitimate interests in operating the Site.
- As a data subject, you have the right to request from INSIGHTEC access to, rectification of, erasure of, and/or restriction of processing of your Personal Information. You also have the right to object to further processing of your Personal Information and to request that your Personal Information be transferred to a third party. To exercise any of these rights, please contact INSIGHTEC at [dataprivacy@insightec.com](mailto:dataprivacy@insightec.com). INSIGHTEC will respond to you in accordance with applicable law.

- You may withdraw your consent to the processing of your Personal Information at any time without such withdrawal affecting the lawfulness of processing that occurred before the withdrawal. You may unsubscribe to INSIGHTEC newsletters by clicking the “Unsubscribe” button at the bottom of each newsletter, or you may email [dataprivacy@insightec.com](mailto:dataprivacy@insightec.com) to withdraw your consent to the processing of your Personal Information.
- INSIGHTEC transfers Personal Information to Israel and, for such transfers, relies on the fact that the European Commission has determined that Israel provides adequate safeguards for protection of Personal Information.
- If you have a concern with the handling of your Personal Information, you may lodge a complaint with the applicable Supervisory Authority in the country in which you reside; however, INSIGHTEC asks that you first contact INSIGHTEC at [dataprivacy@insightec.com](mailto:dataprivacy@insightec.com) so that INSIGHTEC may attempt to fully address your concern.

### 13. California Privacy

The California Consumer Privacy Act of 2018 (“CCPA”) provides certain rights to individuals who reside in the State of California (“CA Consumers”). Below is a description of CA Consumers’ rights concerning their personal information and INSIGHTEC’s practices regarding the collection, use, disclosure and sale of personal information about CA Consumers.

#### CA Consumers’ Rights:

CA Consumers have the right to request that INSIGHTEC disclose what personal information it collects, uses, discloses and sells. A CA Consumer may request details concerning any or all of the following: (i) specific pieces of personal information that INSIGHTEC has about the CA Consumer; (ii) categories of personal information INSIGHTEC has collected about the CA Consumer; (iii) categories of sources from which the personal information is collected; (iv) categories of personal information about the CA Consumer that INSIGHTEC sold or disclosed for a business purpose; (v) categories of third parties to whom the personal information was sold or disclosed for a business purpose; and (vi) the business or commercial purpose for collecting or selling personal information. To make any of these requests, please email INSIGHTEC at [dataprivacy@insightec.com](mailto:dataprivacy@insightec.com) or call +1-844-739-3204. Once INSIGHTEC receives your request, we will need to verify that you are the person about whom INSIGHTEC has collected personal information. In some situations, INSIGHTEC may require you to provide additional information about yourself as part of this verification process. INSIGHTEC will inform you of additional information it requires (if any) to verify your identity after it receives your request. If INSIGHTEC is not able to verify your identity by reasonable methods, INSIGHTEC may deny your request, and in such case, INSIGHTEC will provide you a reason in writing as to why it cannot comply with your request.

CA Consumers have the right to request the deletion of their personal information which is collected or maintained by INSIGHTEC. To make a deletion request, please email us at [dataprivacy@insightec.com](mailto:dataprivacy@insightec.com) or call +1-844-739-3204. Once INSIGHTEC receives your request, as described above, INSIGHTEC will verify that you are the person about whom INSIGHTEC has collected personal information. Please be aware that there are certain exceptions to the right of deletion of personal information. INSIGHTEC will inform you in writing if there is any such exception or if there is any other reason why INSIGHTEC cannot comply with your request.

A CA Consumer may use an authorized agent (which may be a person or a business entity registered with the CA Secretary of State) to submit any of the requests described above on the CA Consumer’s behalf. The authorized agent must follow processes specified above for submitting such requests. When a CA Consumer uses an agent to submit a request, INSIGHTEC may require the CA Consumer to provide the agent with signed permission to submit such request and may also require the CA Consumer to verify his/her own identity directly with INSIGHTEC. INSIGHTEC may deny a request from an agent if the CA

Consumer does not submit proof to INSIGHTEC that the agent has been authorized by the CA Consumer to act on the CA Consumer's behalf.

CA Consumers have the right to not receive discriminatory treatment for the exercise of privacy rights under the CCPA. INSIGHTEC will not discriminate against any CA Consumer for the exercise of those rights.

INSIGHTEC's practices regarding the collection, use, disclosure and sale of personal information about CA Consumers

Please be advised that INSIGHTEC does not sell personal information about any CA Consumers, including but not limited to any information about minors.

The table below describes the categories of CA Consumers' personal information INSIGHTEC has collected in the last 12 months, categories of sources from which that information was collected and the business or commercial purpose for which the information was collected:

| Category of personal information INSIGHTEC has collected   | Category of source from which information was collected | Business/commercial purpose for which information was collected |
|--|---|---|
| Identifiers (e.g., name, online identifier, email address and similar identifiers)                           | CA Consumers; advertising networks                      | For INSIGHTEC's marketing purposes                              |
| Geolocation data   | CA Consumers; advertising networks                      | For INSIGHTEC's marketing purposes                              |
| Health information   | CA Consumers  | For INSIGHTEC's provision of customer service                   |
| Health insurance information   | CA Consumers  | For INSIGHTEC's provision of customer service                   |
| Inferences drawn from health information and health insurance information to create a profile about a person | CA Consumers  | For INSIGHTEC's provision of customer service                   |
| Professional or employment-related information   | CA Consumers  | For INSIGHTEC's legitimate interests and business purposes      |

The table below describes the categories of CA Consumers' personal information that INSIGHTEC has disclosed to third parties for a business purpose and corresponding categories of third parties to whom the information was disclosed in the last 12 months:

| Category of personal information that INSIGHTEC has disclosed  | Category of third party to whom personal information was *disclosed<br><br>(*Please note "disclosed", as used in this table, denotes storage of personal information on Insightec's vendor's/service provider's storage platform for Insightec's operational purposes) |
|--|--|
| Identifiers (e.g., name, online identifier, email address and similar identifiers)                           | INSIGHTEC's vendors/service providers  |
| Geolocation data   | INSIGHTEC's vendors/service providers  |
| Health information   | INSIGHTEC's vendors/service providers  |
| Health insurance information   | INSIGHTEC's vendors/service providers  |
| Inferences drawn from health information and health insurance information to create a profile about a person | INSIGHTEC's vendors/service providers  |
| Professional or employment-related information   | INSIGHTEC's vendors/service providers  |

CA Consumers may contact INSIGHTEC with questions or concerns about INSIGHTEC's privacy policy or practices. Please see the section below ("Questions?") for INSIGHTEC's contact information.

### Questions?

If you have any questions (or comments) concerning this Privacy Policy, you are most welcome to send us an email to the following address: [dataprivacy@insightec.com](mailto:dataprivacy@insightec.com) and we will reply within a reasonable timeframe.