

## **Privacy Policy**

Magnus International Search & Rescue Ltd. (“**Magnus**”, “**we**”) is committed to maintaining the privacy of its users (“**user**”, “**you**”). The following information describes how Magnus collects and processes information about you when you use our mobile application.

Our privacy policy (“**Privacy Policy**”) explains:

- [What information we collect and why we collect it](#)
- [How we use that information](#)
- [Your rights with regard to the collection of such information](#)

## **General**

Magnus provides a mobile Application (“**App**”) that allows its users to contact Magnus via an SOS emergency button in case of rescue emergencies, so Magnus can arrange the rescue operations required in the designated area where the user is located. The App can be provided to business customers who wish to equip their employees (“**End Users**”) with Magnus’ safety services when traveling abroad, as well as individuals who purchase the App via the Magnus website (“**Website**”) to be utilized when traveling. The App enables users to contact the Magnus hotline and communicate with Magnus about an emergency and require a rescue, as well as form an in-app group to efficiently communicate with other users of the App (the “**Services**”).

## **Device**

Users can access the App through various Devices. A “Device” is any digital device used to access the App, including without limitation a desktop, laptop, mobile phone, tablet, or other consumer electronic device. This Privacy Policy governs your access to the App, regardless of how you access them, and by using our App you consent to the collection, transfer, processing, storage, disclosure and other uses described in this Privacy Policy.

## **Collecting Information**

Please note that the scope of this Privacy Policy is limited only to information collected by Magnus through your use of its App. Some information may be automatically collected, and some is collected when you interact with our App. The type of information that may be automatically collected is non-personal information, which includes your session durations, the content you accessed on the App, the frequency and scope of your use of the App and information about your Device and internet connection including the operating system you use and browser type.

Information from which you can be personally identified may also be collected, including but not limited to your name, nickname, telephone number, and the location of the Device through which you used the App (hereinafter: “**Personal Information**”). Personal Information shall be collected only if received voluntarily from you, including, without limitation, via the following ways:

a. Contacting Us via the SOS Button

If you wish to contact us via the SOS button for support and require a rescue, we will collect your full name, location, Device ID, phone number and the content you provide to facilitate your request.

b. In-App Group

If you wish to form an in-app group to communicate with other users of the App, you may request the Magnus team to enable a group chat option. Please note, that you may be able to conduct video calls and record audio content to communicate with other users, and such functions will require your authorization to our access to your Device camera and microphone. Magnus will collect the information submitted within the in-app group to allow you to use it.

c. Managing a Rescue

The operation of the App requires Magnus to continuously track user location, so in case a rescue is required, it will be able to accurately trace the designated area and nearby locations to design and manage the rescue operation. Please note that when such operation is initiated, different Personal Information may be disclosed to other partners of Magnus and local entities and individuals that may partake in the rescue operation.

d. Downloading Materials

If you wish to download certain professional and promotional materials provided over our App (“**Materials**”), we will collect your location to provide you with the relevant Materials. We might further monitor and collect data concerning your usage of the Materials, such as the number of pages you have read and how long you spend reading the Materials.

e. Collecting Health Related Data

Please note that the provision of the Services, may require Magnus to collect health related data (which includes Personal Information that relates and is relevant to your mental and physical health condition). In case the provision of the Services requires us to do so, such Personal Information may be disclosed to Magnus’ partners, entities and individuals (including medical staff and professionals) who partake in the provision of the Services and such disclosure is necessary to facilitate the provision of the Services. By using the Services, you explicitly consent to this type of collection and disclosure of such sensitive Personal Information.

## **Use of Information**

We use Personal Information we collect from you for a range of different business purposes according to different legal bases of processing. We may use or process your Personal Information for the following purposes. One or more purposes may apply simultaneously.

### **1. Providing the Requested Services**

- We collect Personal Information listed in Sections a-d above, to provide you with the Services you contracted to receive.
- Such collection of information will enable us to provide you with technical and professional assistance, with regard to the Services you use or intend to use.

We process the Personal Information where it is necessary for the adequate performance of the contract regarding the provision of the App.

### **2. Improvement and Development of the Services**

- We collect Personal Information to improve and develop our Services and understand feedback on the App and to help provide more information on the use of the App quickly and easily.
- We collect Personal Information for ongoing review and improvement of the information provided on our App to ensure it is user friendly.
- We collect Personal Information to improve the management and administration of our business and maintain compliancy with our internal policies and procedures.
- We conduct surveys and research, test features in development, and analyze the information we have to evaluate and improve our Services, develop new features, and conduct audits and troubleshooting activities.

We process this information in light of our legitimate interest in improving the App and Services, to allow our users to have the best experience.

### **3. Maintain a Safe and Secure Environment**

We may use your information to detect and prevent fraud, abuse and security incidents in the following ways;

- Verify and authenticate your identity and prevent unauthorized or illegal activity;
- Enhance the safety and security of our App;
- Conduct security investigations and risk assessments;
- Prevent or take action against activities that are, or may be, in breach of our terms of service or applicable law.

We process this information in light of our legitimate interest in improving our Services and App, and enabling our users to browse in a secure environment.

### **4. Personalize Content, Advertising and Marketing**

- If you have used the Magnus 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 App by providing you with personalized content, recommendations, and features.

We process this information in light of our legitimate interest to personalize your experience and customize our content.

### **Disclosure of Information and Transfer of Data**

We reasonably attempt to ensure that we never intentionally disclose any of your Personal Information, to any third party without having received your permission, except as provided for herein and in this Privacy Policy or otherwise as permitted or required under law.

In order to perform our contractual and other legal responsibilities or purposes, we may, from time to time, need to share your Personal Information with third parties. We may as well share your Personal Information with our affiliates, subsidiaries or any third party service providers and individuals to facilitate our App and Services or any portion thereof, such as marketing, data management, operating distributors, rescue and insurance services. Please note that if you are an End User, the information submitted on the App may be shared with the applicable Customer.

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 Device, through which they can collect information about your usage of our App. This helps us compile aggregated statistics about the effectiveness of our App and Services.

The above mentioned third parties may be located in countries other than your own, and we may send them information we receive. When such third party service providers process your Personal Information on our behalf, we will assure that they comply with obligations similar to those which are set forth in this Privacy Policy. We will also assure that they will abide by our data privacy and security requirements, and will be allowed to use the Personal Information solely for the purposes we set. We will transfer your Personal Information while using appropriate and suitable safeguards, while using a variety of legal mechanisms, including contracts, to ensure your rights and protections travel with your data.

We may also transfer your information, including Personal Information, in connection with a corporate merger, consolidation, the sale of related assets or corporate division or other fundamental corporate changes. Furthermore, information about you may also be released in order to comply with any valid legal obligation or inquiry or process such as a search warrant, subpoena, statute or court order. We will also release specific information in special cases, such as if you use the App and Services to perform an unlawful act or omission or take any

act or omission that may damage Magnus, its property and goodwill, or if there is an attempted breach of the security of the App or a physical or property threat to you or others. The authority supervising such activities is the Israeli Privacy Protection Authority, and you have the right to file a complaint to it or any other relevant supervisory authority.

### **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 [SERVICE@MAGNUSAFETY.COM](mailto:SERVICE@MAGNUSAFETY.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 following 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 an 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 information collected on our App, Magnus 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.

If you are an End User and you submit a request, we will notify the relevant Customer about your request, and make our best efforts to enable them to allow you to exercise your rights.

If you wish to file a request regarding any of the above, you may contact us at: [SERVICE@MAGNUSAFETY.COM](mailto:SERVICE@MAGNUSAFETY.COM)

### **Notice to California Residents**

This section is designated for California residents and is provided under the California Consumer Privacy Act, as amended by the California Privacy Rights Act of 2020 (“**California Privacy Laws**”). It explains your privacy rights, provides “notice at collection”, and provides

certain mandated disclosures about how we handle your Personal Information. This section uses certain terms that have the meanings given to them by the California Privacy Laws, unless otherwise specified. Please note that some of the disclosure obligations required under the California Privacy Laws are satisfied within other sections of this Privacy Policy.

The California Privacy Laws permit some users to request to exercise certain rights. If these rights are applicable to you, you are afforded with the following rights:

a. Right of access

You can request Magnus for certain information about our practices with respect to your Personal Information. In particular, you can request to receive information on the following:

- The categories and specific pieces of your Personal Information that we have collected.
- The categories of sources from which we collected your Personal Information.
- The business or commercial purposes for which we collected or share your Personal Information.
- The categories of third parties with which we shared your Personal Information.

b. Sale of Personal Information

You can be rest assured that we do not sell your Personal Information.

c. Right to Limit Use and Disclosure of Sensitive Personal Information

We do not share sensitive Personal Information for cross-context behavioral advertising and we do not sell sensitive Personal Information.

d. Exercising your California Law Rights

Please note that we will be required to verify your identity and request before an action is taken to exercise your rights. As a part of this process, government identification may be required. Moreover, you may designate an authorized agent to make a request on your behalf. We make our best efforts to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. Any disclosures we provide, will only cover the 12 months period preceding your verifiable request's receipt. If, for some reason, we cannot reply within such time frame, our response will include an explanation for our inability to comply. If you wish to exercise your California Privacy Laws rights, please contact us at: [SERVICE@MAGNUSAFETY.COM](mailto:SERVICE@MAGNUSAFETY.COM)

e. Right of No Retaliation Following Opt-Out or Exercise of your Rights

If you choose to exercise your rights, we will not charge you different prices or provide different quality of our Services, unless those differences are related to your provision of your Personal Information. We will not discriminate against you for exercising any of your rights and unless permitted by the California Privacy Laws, we will not:

1. Deny you goods or services.
2. Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
3. Provide you with a different level or quality of goods or services.
4. Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

### **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.

To be in accordance with CAN-SPAM, Magnus agrees to the following:

- 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.
- Honor 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 [SERVICE@MAGNUSAFETY.COM](mailto:SERVICE@MAGNUSAFETY.COM) and we will promptly remove you from ALL correspondence.

### **Cookies**

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

### **Opt In or Opt Out**

You are always in control of your data, and if you choose to receive information from us, or others, you can change your mind later. If, at any time, you would like to stop receiving such information or opt out of a feature, you may notify us by writing to [SERVICE@MAGNUSAFETY.COM](mailto:SERVICE@MAGNUSAFETY.COM). You should be aware, however, that it is not always possible to completely remove or modify information in our databases and servers, although we will always make reasonable efforts to do so upon your request.

### **Links to Other Websites**

The App may provide links to other websites. Please be aware that these other websites are not covered by our Privacy Policy. This Privacy 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 Magnus. We suggest that when linking to another website, you always read that website's privacy policy before volunteering any personally identifiable information.

### **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 App and Services to you. 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 and transmission is at the users own risk.

### **Data Retention**

Generally, Magnus does not retain information longer than necessary to provide its Services and for its reasonable business and lawful needs. If you withdraw your consent to us processing your Personal Information, we will erase your Personal Information from our systems, unless the Personal Information is required for Magnus to establish, exercise or defend against legal claims or it is necessary for the performance of the requested Services.

### **Children's Privacy**

The App is 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 APP, UNLESS PARENTAL CONSENT IS PROVIDED ACCORDINGLY**



### **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 [SERVICE@MAGNUSAFETY.COM](mailto:SERVICE@MAGNUSAFETY.COM).

### **Revisions and Modifications to our Privacy Policy**

We reserve the right to revise, amend, or modify this Privacy Policy at any time. When changing the policy, we will update this posting accordingly. Please review this Privacy Policy often so that you will remain updated regarding our current policies.

### **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 submitted to the competent courts in Tel Aviv, Israel, to the exclusion of any other jurisdiction.

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