

## **PRIVACY POLICY**

We at Bermad CS Ltd ("**Bermad**", "**we**", "**us**", "**our**") respect your privacy.

This Privacy Policy ("**Policy**") explains the privacy practices for our BERMAD GreenApp™ mobile application (the "**App**"). It also describes the rights and options available to you with respect to your information.

BERMAD GreenApp™ mobile application is a user-friendly app (free on Android and iOS). With this app you can connect and manage your irrigation from your smart-phone or tablet (the "**Service**").

### **PERSONAL DATA WE MAY COLLECT**

**We may collect your user registration information such as name, email, phone number.**

**User registration.** We may decide in the future to require registration to the service. When you will sign up to the Service, we may process your name, phone and email address. If you sign-up through third party service like Facebook, Instagram, or Google, we may also collect your profile photo available on these services. Once you are signed-up, we will use a unique user ID to identify your user account. We will call all of this data "**User Onboarding Data**".

**We may also process, posts, search phrases and reaction to content that you provide. these may include sensitive data.**

**User active lifetime.** Throughout your use of the Service, we may also process posts, search phrases and reaction to content that you provide. This data We will call this "**User Active Lifetime Data**".

**We may process analytics about your use of the Service such as your user-clicks on the Service, the content you viewed and when you viewed it.**

**User analytics.** We may process the user-interface clicks you've engaged in on the Service, the time-zone set on your mobile device, the time and date you last used the Service, as well as an indication of which content and user-notifications you viewed on the Service and when. We will call this "**Analytics Data**".

**We will process the content of your user posts and interactions with the service, your unique user ID on the Service and your device's unique fingerprint.**

**User moderation.** We may process the content of your user posts and interactions with the service, your unique user ID on the Service and your mobile device's unique fingerprint. We will call this "**User Moderation Data**".

You are not legally obligated to provide or give access to any personal data, but we do need this information to provide you the Service.

### **HOW WE USE PERSONAL DATA**

**To provide and manage the functionality and service that the Service offers.**

We process User Onboarding Data, User Active Lifetime Data and User Analytics to provide and manage the functionality and service that the Service offers.

**To send you notifications and updates about the Service and contact you with administrative messages**

We process the User Onboarding Data, User Active Lifetime Data and User Analytics in order to send notifications and updates about the Service and the content you may be interested in on the Service. You can control the notification and updates you receive through the designated menu of the Service.

We also process the User Onboarding Data and User Active Lifetime Data to contact you with administrative messages.

**For product development, trend research and business development, to improve and enhance the Service.**

We process Onboarding Data, User Active Lifetime Data and User Analytics to obtain insights for our product development, optimize user notifications, research trends, for business development purposes as well as to improve and enhance the Service.

**To control and manage user-moderation in the appropriate circumstances.**

We will process User Moderation Data to detect and handle inappropriate user content. This may lead us to restrict the inappropriate user's access to the Service, by way of issuing the user a warning, suspending the user temporarily, or banning the user from the Service altogether.

## **COOKIES AND OTHER TRACKERS**

**What are cookies?**

Cookies are text files, comprised of small amount of data, that maybe saved on your device when you use the application.

The information that the cookies maintain is to make your experience with our service more convenient and personal. For example, knowing your first name lets us welcome you the next time you engage with the service.

**Subject to you consent, we may use cookies for advertising purposes, to provide social media features and to analyze user traffic to the Service. You may opt-out from such use by contacting us at [Web-service@bermad.com](mailto:Web-service@bermad.com) or by using the opt-out mechanisms on the Service**

Subject to your consent, we may use cookies and similar technologies to customize content and advertising, to provide social media features and to analyses traffic to the Service. You may opt-out from such use at any time by contacting us at [Web-service@bermad.com](mailto:Web-service@bermad.com), or by using the opt-out mechanisms on the Service.

**Subject to you consent, we may use advertising ID for use**

Subject to you consent, we use advertising ID for use by advertising and analytics providers, to provide advertising features and for service analytics

**by advertising and analytics providers, to provide advertising features and for service analytics purpose. You may opt-out from such use right from the Ads section of the Google Settings app on your devices**

purpose. The advertising ID is a unique but user-resettable string identifier that lets ad networks and other apps and providers to anonymously identify you.

You can reset their advertising ID at any time, right from the Ads section of the Google Settings app on your device. From the same app, you can also opt-out of targeted advertising based on the advertising ID by setting the appropriate ad tracking preference.

## **WHEN AND HOW WE SHARE PERSONAL DATA WITH OTHERS**

*We will not share your information with third-parties, except in the events listed below or when you provide us your explicit and informed consent*

**We may share your information with our service provider helping us to operate our business and the Service.**

We may share your personal information with our service providers who assist us with the internal operations of the Service and other aspects of our business. These include:

[We will update this list when it will be relevant]

These companies are authorized to use your personal information only as necessary to provide these services to us and not for their own promotional purposes. We do not sell your personal information to third parties.

**Subject to your consent, we may share information about your use of our Service with advertising and analytics partners. You may opt-out from this by contacting us at [Web-service@bermad.com](mailto:Web-service@bermad.com), or by using the opt-out mechanism on the Service.**

Subject to your consent, we share information about your use of our Service with advertising and analytics partners. The purpose for which such third parties process this information is for marketing and advertising. You may opt-out from such sharing at any time by contacting us at [Web-service@bermad.com](mailto:Web-service@bermad.com) or by using the opt-out mechanism on the Service.

**We will share your information with competent authorities, if you abused your rights to use the Service, or violated any applicable law.**

If you have seriously abused your rights to use the Service, or violated any applicable law, we will share your information with competent authorities and with third parties (such as legal counsels and advisors), for the purpose of handling of the violation or breach.

**We will share your information if we are legally required.**

If we are required to disclose your information by a judicial, governmental or regulatory authority.

**We will share your information with third-party in any event of change in Bermad's structure.**

If the operation of Bermad or the Service is organized within a different framework, or through another legal structure or entity (such as due to a

merger or acquisition, we will share your information to enable the structural change.

## SECURITY AND DATA RETENTION

**We will retain your personal information for as long as we need it to operate the Service, and thereafter as needed for record-keeping matters.**

We retain personal data for the duration needed to support our ordinary business activities operating the Service. Thereafter, we will still retain your personal information as necessary to comply with our legal obligations, resolve disputes, establish and defend legal claims and enforce our agreements.

**We implement measures to secure your information**

We implement measures to reduce the risks of damage, loss of information and unauthorized access or use of information, such as encrypted transmission of the data we communicate to and from users.

However, these measures do not provide absolute information security. Therefore, although efforts are made to secure your personal information, it is not guaranteed, and you cannot expect that the Service will be immune from information security risks.

## ADDITIONAL INFORMATION FOR USERS IN THE EU

**Bermad CS Ltd. is the data controller of the personal data we process on the Bermad platform.**

Bermad CS Ltd. is the data controller for the purposes of the personal data processed on the Bermad platform.

Bermad is based in Israel.

**To contact our European representative or Data Protection Officer**

Our European representative, for the purposes of this Policy, is Bermad Europe S.L. If you are within the European Economic Area, you may contact our European representative at the following address Calle Comercio, 1 – Nave 22, 08780 Pallejà, Barcelona, Spain.

**Legal bases for processing your information**

The legal basis for collecting and processing User Onboarding Data, User Active Lifetime Data is the performance of our term of service contract in providing you the Service and our legitimate interests in administering and managing the Service.

The legal basis of collecting and processing User Analytics is our legitimate interests in developing and enhancing the Service and our business.

The legal basis for processing User Moderation Data is our legitimate interests in maintaining an appropriate and safe environment on the Service, as well as protecting the vital interests of other users of the Service.

The legal basis under EU law for voluntarily sharing your data with competent authorities is our legitimate interests in defending and enforcing

against violation and breaches that are harmful to our business.

The legal basis under EU law for sharing your data if we are legally required to do so by authorities, is our legitimate interests in complying with mandatory legal requirements imposed on us.

The legal basis under EU law for sharing your data in the event of a structural change of our business is our legitimate interests in our business continuity.

The legal basis under EU law for using your email address to send you updates to this Policy is its necessity for our compliance with the legal obligations of the GDPR.

The legal basis for sharing information about your use of our Service with advertising partners is your consent.

**We will transfer your data internationally only in accordance with applicable data protection laws.**

Information we collect from you will be processed in Israel, which is recognized by the European Commission as having adequate protection for personal data.

If we transfer your information from within Europe to other jurisdictions outside Europe, we will always endeavor to do so using adequate safeguards determined by the EU Commission, such as Privacy-Shield certified companies in the United States.

**You have certain rights to access, update or delete your information, obtain a copy of your information and object or restrict certain data processing activities.**

If you are in the EU, you have the following rights under the GDPR subject to the limitations that the GDPR attaches to these rights:

**Right to Access** your personal data that we process and receive a copy of it.

**Right to Rectify** inaccurate personal data we have concerning you and to have incomplete personal data completed.

**Right to Data Portability**, that is, to receive the personal data that you provided to us, in a structured, commonly used and machine-readable format. You have the right to transmit this data to another service provider. Where technically feasible, you have the right that your personal data be transmitted directly from us to the service provider you designate.

**Right to Object**, based on your particular situation, to using your personal data on the basis of legitimate interest. However, we may override the objection if we demonstrate compelling legitimate grounds, or for the establishment, exercise of defense of legal claims. You may also object at any time to the use of your personal data for direct marketing purposes.

**Right to Restrict** processing your personal data (except for storing it) if you contest the accuracy of your personal data, for a period enabling us to verify its accuracy; if you believe that the processing is unlawful and you opposes the erasure of the personal data and requests instead to restrict its use; if we no longer need the personal data for the purposes outlined in this Policy, but you require them to establish, exercise or defense relating to legal claims, or if you object to processing, pending the verification whether our

legitimate grounds for processing override yours.

**Right to be Forgotten.** Under certain circumstances, such as when the personal data are no longer necessary for the purposes for which they were processed, you have the right to ask us to erase your personal data. However, we may still process your personal data if it is necessary to comply with a legal obligation we are subject to under laws in EU Member States or for the establishment, exercise or defense of legal claims.

If you wish to exercise any of these rights, contact us at [Web-service@bermad.com](mailto:Web-service@bermad.com).

We reserve the right to ask for reasonable evidence to verify your identity before we provide you with information. Where we are not able to provide you with information that you have asked for, we will explain the reason for this.

**You have a right to submit a complaint to the relevant supervisory data protection authority.**

Subject to applicable law, you have the right to lodge a complaint with your local data protection authority. If you are in the EU, then according to Article 77 of the GDPR, you can lodge a complaint to the supervisory authority, in particular in the Member State of your residence, place of work or of an alleged infringement of the GDPR. For a list of supervisory authorities in the EU, click [here](#).

## CHANGES TO THIS PRIVACY POLICY

**If we change this Policy, we will post an updated version of the Policy.**

From time to time, we may change this Policy, in which case we will post an updated version of the Policy. The latest version of the Policy will always be accessible through the Service.

## CONTACT US

**You can contact us at** [Web-service@bermad.com](mailto:Web-service@bermad.com)

Should you have any inquiries, complaints or suggestions, you may contact us at [Web-service@bermad.com](mailto:Web-service@bermad.com). We will do our best to resolve your issue in a timely manner.

Last Update: April 10, 2019.