

Privacy and Cookie Use Policy

Effective Date: November 7, 2018

General

Because your privacy is important to Noris Medical Ltd., (the “Company” or “We”) the Company will operate by the principles listed here, which are incorporated by reference into the Company’s websites (the “Website”) Terms of Use (the “Terms”), any applications and platforms (the “Platform”) and related services. This policy (the “Privacy Policy”) was created in order to inform you of the type of information the Company will collect from you and third parties, how the Company will use it and your choices about it. We only use that information where we have a proper legal basis for doing so.

You may visit and/or use the Website, Platform and/or services only if you fully agree to this Privacy Policy - and by accessing and/or using any of the above, you signify and affirm your informed consent to this Privacy Policy, including to the collection and processing of your Information as defined and explained below.

Please note: you are not obligated by law to provide us with any information. You hereby acknowledge, warrant and agree that any information you do provide us is provided of your own free will and consent, for the purposes and uses described herein.

What Information is collected?

The Company may collect information, both *personal* – identifying information such as your name, e-mail, mailing address, phone number etc. and *non-personal* – non-identifying information such as your gender, birthdate, or country in which you live, (collectively with all information identified below, the “Information”) from you when you in one or more of the manners specified herein.

When registering on, filling a form or downloading certain materials from the Website or otherwise using the services and Platform you may be asked to enter your: name, e-mail address, mailing address, phone number, your company information, profile and/or account information and content, possible future purchase intent and other information which We have identified as pertinent to assisting the Company in product development and marketing and in personalizing the user experience and you can also choose to share with us location data or visual content.

We may collect information about the device you're using our Platform and/or services or Website on, including type of device, operating system, settings, unique device identifiers and crash data that helps us understand when something breaks. Whether we collect some or all of this information often depends on what type of device you're using and its settings. For example, different types of information are available depending on whether you're using a Mac or a PC, or an iPhone or Android phone. To learn more about what information your device makes available to us, please also check the policies of your device manufacturer or software provider.

There is also Information that may be automatically collected including (but not exclusive to) your log data, information that your browser or mobile application automatically sends, IP address, profile information, aggregate user data, preferences, operating system, browser or mobile application type and settings, computer specifications, activity on the Website and/or Platform, technical and usage information and information and specifications of your device.

Additional ways of collecting Information include, but are not limited to: your access to customer support; order processing; registration or use of software provided with our Products; and any other times in which identifying factors can assist the Company in product development, marketing and in personalizing your experience.

If you buy something on our Website or make any payment, we may collect payment information, contact information (address and phone number), delivery details and details of what you bought and any other information required to enable you to access and use the payment services. This information will be used, among other things, by the payment processing party to:

- Process and fulfil your order via Third Party Services (as defined below) such as PayPal, Stripe, shipping companies or others.
- Detect and prevent fraud, abuse, security incidents, and other harmful activity.
- Conduct security investigations and risk assessments.
- Conduct checks against databases and other information sources.
- Comply with legal obligations (such as anti-money laundering regulations).
- Enforce the payment terms and other payment policies.
- With your consent, send you promotional messages, marketing, advertising, and other information that may be of interest to you based on your preferences.

The Third Party Services processes this information given its legitimate interest in improving the payment services and its users' experience with it, and where it is necessary for the adequate performance of the contract with you and to comply with applicable laws.

If you link your Facebook or Google account or accounts from other services, or post directly from our Platform to such services, We may also get information from those accounts (such as your friends or contacts). The information we get from those services depends on your settings and their privacy policies, so please check what those are.

We also get information about you and your activity outside the Website in connection with us from our affiliates, advertisers, partners, vendors and other third parties we work with, or other publicly available sources.

Please note: It is hereby clarified that you have no legal obligation to share any Information with the Company and you hereby agree and acknowledge that you are doing so willingly and voluntarily and as mentioned above. You hereby also agree and acknowledge that We may keep Information in databases which will be kept and operate in accordance with all applicable laws and regulations. We will not collect any Information from you without your consent, which is obtained, *inter alia*, through your acceptance of the Terms and this Privacy Policy.

What is your Information used for?

We may collect any of the information We receive from you, subject to applicable law. Further, any of the Information that may be collected, may be used to:

- Personalize your experience (your information helps the Company better respond to your individual needs and present you with options and opportunities more relevant to you).
- Improve the Website (the Company continually strives to improve its Website offerings based on the information and feedback that have been received from you).
- Improve customer service (respond more efficiently to customer service requests, inquiries and support needs) and provide technical assistance.
- Practical considerations such as, but not limited to, sending order and shipping confirmations, processing your transactions (if applicable).
- Administer contests, promotions, surveys or other site features.
- Send periodic emails (information and updates including Company news, updates, related product or service information etc.).

- Sales related communications (personal emails and phone calls, event invitations etc.).

If you choose to register and/or subscribe to Company's newsletter and/or download materials from the Website and/or responding to a survey and/or fill out a form on the Website or otherwise providing Company with your details, you agree that We may use your contact information for informing you regarding our Products, Platform and services and send you marketing materials. We may customize such marketing materials to be suitable for your interests and needs. You may withdraw your consent by clicking the unsubscribe button available on such materials or by e-mailing Us at any time. Please be notified that by unsubscribing you will not receive any additional marketing materials from the Company and your personal data, as provided by you, shall be deleted from our applicable database within one week. In the event you are a contact person of an active account of the Company, we will delete only your personal information however, we may not delete the account details, any such deletion of data may occur only after a request of deletion by the authorized person in the account.

We may contact you with important information regarding our services, or your use thereof, such as notices (through any of the means available to us) if a certain service is temporarily suspended for maintenance; reply to your support ticket or e-mail; send you reminders or warnings regarding upcoming or late payments for your current or upcoming subscriptions; forward abuse complaints regarding your use; or notify you of material changes in our services. You may not be able to opt-out of receiving some of such service and billing messages.

We have a legitimate interest in using your information in these ways. It is also fundamental to the nature of the service we provide and to make it relevant and personal to you. We also have a legitimate interest to improve the Website, the Platform and the services, maintain our relationship with you, and protect users. To do so, We may: allow users to make themselves searchable, conduct analytics on users and what they are doing, improve Website, Platform and services and offer new features, send updates and news by email or push notification, depending on your settings, work with law enforcement and keep the Website and others safe (We may get requests for account information from law enforcement authorities like the police or courts).

How is your Information protected?

The Company implements a variety of security measures throughout each step of your use of the Website and/or providing us with your Information and/or retaining it, to maintain the safety of your personal Information, including when you enter, submit, or access your personal Information. These security measures include physical, electronic and procedural measures. Among other things, we offer HTTPS secure access to most areas on our services; the

transmission of sensitive payment information (such as a credit card number) through our designated purchase forms is protected by an industry standard SSL/TLS encrypted connection; and we require our Third Party Services to regularly maintain customary adequate protection standards. It is important to note though that, despite the Company's greatest efforts, no security measures are completely fool-proof. We also regularly monitor our systems for possible vulnerabilities and attacks, and regularly seek new ways and Third Party Services for further enhancing the security of our services and protection of our users' privacy. We therefore encourage you to set strong passwords for your account and content (where applicable) and avoid providing us with any sensitive information which you believe its disclosure could cause you substantial or irreparable harm. Furthermore, because certain areas on our Website, Platform and/or services might be less secure than others, and since e-mail and instant messaging are not recognized as secure forms of communications, we request and encourage you not to share any Information on any of these areas or via any of these methods.

If you know or have reason to believe that your account credentials or Information stored with us have been lost, stolen, misappropriated, or otherwise compromised or in case of any actual or suspected unauthorized use of your account, please contact us following the instructions in the Contact Us section below.

Do We use cookies?

Yes, We may now or in the future use cookies without further notice (Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enable the site's or service provider's systems to recognize your browser and capture and remember certain information.). You may change the setting, so your browser may either refuse all cookies or informs you when a cookie is being sent.

The Company uses cookies to understand and save your preferences and log in Information for future visits and to compile aggregate data about site traffic and site interaction so that We can offer better experiences and tools in the future, including the ability to improve the Website navigation and present you with information that is more relevant to your needs. The Company may contract with a third party service provider to assist in better understanding the Website's visitors. These service providers are not permitted to use the Information collected on the Website except to help the Company conduct and improve business and interaction with you.

The Website and/or Platform may also be, now or in the future, monitored by Google Analytics, a web analytics service provided by Google, Inc., or other

similar tools/services. Google Analytics, and other services, use cookies to help the Company analyze how visitors browse a site. No Information is transferred to such services (which gather all information directly through cookies or similar methods). The Information these services gather about your use of the Website and/or Platform is retained by Google in accordance with their Terms of Service available on their websites.

We may embed content from other sites such as YouTube (videos) and social media sites such as Facebook, LinkedIn and Twitter. We have no control over whether embedded content sets a cookie on your browser or not.

Publication; Content; Is any Information disclosed to outside parties?

The Company does not sell, trade, or otherwise transfer to outside parties your personally identifiable Information. This does not include affiliated entities controlled by us or under common direct or indirect control, trusted third parties who assist the Company in operating the Website, conducting the Company's business, or servicing you, or third party vendors or service providers (including third parties that are located in countries other than your own), so long as those parties agree to keep this information confidential. If you buy something via the Website, we may share information required to process the transaction and for the fulfilment of your order, including by third parties and subject to such third parties' policies.

We may share Information with selected service providers, whose services and solutions complement, facilitate and enhance our own. These include hosting and server co-location services, communications and content delivery networks (CDNs), data and cyber security services, billing and payment processing services, domain name registrars, fraud detection and prevention services, web analytics, e-mail distribution and monitoring services, session recording and remote access services, performance measurement data optimization and marketing services, content providers, and our legal and financial advisors (collectively, "Third Party Service(s)"). Such Third Party Services may receive or otherwise have access to our users Information, in its entirety or in part – depending on each of their particular roles and purposes in facilitating and enhancing our services and business, and may only use it for such purposes. We are not responsible for such websites' or services' privacy practices and encourage you to be aware when you leave our services and read the privacy statements of each and every website and service you visit. This Privacy Policy does not apply to such linked third-party websites and services.

The Company may also release your Information when the Company believes the release is appropriate to comply with the law, enforce Company Website or other policies, resolve disputes regarding our users or protect other Company's or others legitimate rights, rights, property, or safety. However, non-personally identifiable Information may be provided to other parties for marketing, advertising, or other uses.

If We were to be involved in a merger, acquisition, sale of assets, bankruptcy, dissolution, reorganisation, or similar transaction or proceeding that involves the transfer of Information, we may share, transfer and/or sell all or any part of it with a party involved in such process, including your Information in connection with such transaction or in contemplation of such transaction (e.g., due diligence). In this event, we will notify you before your personal Information is transferred and becomes subject to a different privacy policy.

We may share aggregated information (information about our users that we combine together so that it no longer identifies or references an individual user) and other anonymized information for regulatory compliance, industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.

Anyone can see the public content you create and the profile and account information you give us and choose to be public or if you choose to publish your content or information created with us to other websites, services, applications or platforms (such as Facebook, YouTube, Instagram or Twitter). Our Website, Platform and/or services may offer publicly accessible blogs, forums, areas etc. Be aware that any information you provide in any such areas may be read, collected, and used by others who access them. If you wish to remove your Information from such areas, feel free to contact us. In some cases, we may not be able to remove your Information from such areas. For example, if you used a third party application to post Information, you will need to login into such application or contact its provider if you want to have the Information you posted through it removed. In any event, we recommend that you do not post any information (or use any posting means to post information) you would not want to be made public on these areas.

If you upload any user content to the Website, Platform and/or provide it in any other way as part of the use of any service, you do so at your own risk.

We cannot control the actions of other users or members of the public who may access your content and are not responsible for the circumvention of any privacy settings or security measures you or We may have placed on your content or Information (including, for instance, password-protected areas). You understand and acknowledge that, even after its removal by you or us, copies of content may

remain viewable in cached and archived pages or if any third parties have copied or stored such content.

Third party website links

The Company Website may contain links to or features from other websites, applications, services etc. (for example Google, Facebook, Instagram). This Privacy Policy covers only the policies of this Company and not of any other websites, applications or services. The Company is not responsible for the privacy policies of third parties. If you choose to link to a third party website, application or service you should be sure to read the privacy policy of that specific website, application or service.

Children's privacy

The Company's Products, Platform and Website services are targeted for a general audience and not for children under the age of 16. To the best of the Company's ability, it will not collect Information from children under the age of 16. If the Company becomes aware of such Information it will do its best to remove it as soon as possible. We are in compliance with the requirements of COPPA (Children's Online Privacy Protection Act). If you are based in the EU you may only use the Website, Platform and our services if you are over the age at which you can provide consent to data processing under the laws of your country or if verifiable parental consent for your use has been provided to us.

European Economic Area ("EU") users; EU Cookie Directive Compliance

We are doing our best to make sure that an EU citizen Personal Information collected by us shall be in compliance with the EU General Data Protection Regulation. Among other things, if you're an EU user, you can:

- Access the information we hold about you. We'll usually share this with you within 30 days of you asking us for it.
- Have your information updated, corrected or deleted. You can update your information in your settings. If you have problems updating the information or if you would like us to delete it, contact us.
- Object to us collecting or processing your information. You can ask us to stop using your information, including when we use your information to send you marketing emails or notifications. If you opt

out of receiving marketing messages from us, we may still send you newsletters and updates about your account. We only send you marketing material if you've agreed to it, but if you'd rather we don't, you can easily unsubscribe at any time.

- In some jurisdictions, applicable law may entitle you to request copies of your personal information held by us. You may also be entitled to request copies of personal information that you have provided to us in a structured, commonly used, and machine-readable format and/or request us to transmit this information to another service provider (where technically feasible).

The Company is in compliance with the requirements of the EU Cookie Directive (Directive 2009/136/EC of the European Parliament and of the Council 25 November 2009). The Website uses cookies for password and other user – data retention. Furthermore, the Website is aimed at an audience who is technically advanced enough to have a reasonable understanding of the use of cookies and personal Information (including the ability to change browser settings to reject cookies) and is deemed to have consented to such use by directing their web-browsers to our site.

Transferring Information

By using the Website, Platform and/or services and by submitting any information, you authorize us to transfer and store your information outside your home country, including in the United States, for the purposes described in this Privacy Policy. The privacy protections and the rights of authorities to access your information in these countries may not be the same as in your home country.

We take additional measures when information is transferred from the EU. This may include having standard clauses approved by the European Commission in our contracts with parties that receive information outside the EU. We also rely on European Commission adequacy decisions about certain countries, as applicable, for data transfers to countries outside the EU.

Retention of Information

We keep your Information only so long as we need it to provide our services and fulfill the purposes described herein. This is also the case for anyone that we share your information with and who carries out services on our behalf. If you no longer want us to use your Information to provide the services to you, you can

request that we erase your Information and close your Account. Please note that if you request the erasure of your Information:

- We may retain some Information as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing safety.
- We may retain and use Information to the extent necessary to comply with our legal obligations (such as tax, legal reporting and auditing obligations).
- Information you have shared with others may continue to be publicly visible, even after your account is deactivated. However, attribution of such information to you will be removed. Additionally, some copies of your information (e.g., log records) may remain in our database, but are disassociated from personal identifiers.
- Because we maintain the Platform to protect from accidental or malicious loss and destruction, residual copies of your Information may not be removed from our backup systems for a limited period of time.

Terms and conditions

Please also visit the Website's and/or Platform's Terms and Conditions section establishing the use, disclaimers, and limitations of liability governing the use of our Website, Platform, applications and services.

This Privacy Policy, its interpretation, and any claims and disputes related hereto, shall be governed by, construed under and enforced in all respects solely and exclusively in accordance with the internal substantive laws of the State of Israel, without respect to its conflict of laws principles. Any and all such claims and disputes shall be brought in, and you hereby consent to them being decided exclusively by, a court of competent jurisdiction located in Haifa, Israel.

Your consent

By using the Website, Platform and/or our services you consent to the online Privacy Policy. If you do not agree to the terms of this policy please do not use the Platform or services or purchase Products from, or otherwise use the Website or register to it and please avoid providing Us with your information.

There will be certain circumstances in which you will be given the choice to opt-in or opt-out of having your personal information used (for example choosing whether or not you want to receive information on similar products when you place an order).

Where you have provided your consent to the collection and/or processing of your Information by us you may withdraw your consent at any time by sending a communication to the Company specifying which consent you are withdrawing. Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal. Additionally, in some jurisdictions, applicable law may give you the right to limit the ways in which we use your Information, in particular where (i) you contest the accuracy of your personal Information; (ii) the processing is unlawful and you oppose the erasure of your personal Information; (iii) we no longer need your personal Information for the purposes of the processing, but you require the information for the establishment, exercise or defense of legal claims; or (iv) you have objected to the processing and pending the verification whether our legitimate grounds override your own.

In some jurisdictions, applicable law may entitle you to require us not to process your Information for certain specific purposes (including profiling) where such processing is based on legitimate interest. If you object to such processing We will no longer process your Information for these purposes unless we can demonstrate compelling legitimate grounds for such processing or such processing is required for the establishment, exercise or defense of legal claims.

Your choices

Our goal is to give you simple and meaningful choices regarding your information. If you have an account, many of the choices you have are built directly into the Website, Platform or your settings. Please note that we may ask you to verify your identity before taking further action on your request. We will make reasonable efforts to respond to your request in a reasonable time and subject to any applicable law. For example, you can, or may be able in the future:

- Request information regarding your personal Information collected by us and its storage.
- Edit information in your account or profile.
- Link or unlink your account from other services (like Facebook, Google, Instagram or Twitter), post share or publish activity ore content to such services.
- Choose whether your activity will be used to customize recommendations and ads for you. If you hide your activity, or don't provide your consent, we won't use it to customize for you.
- Close your account at any time. When you close your account, we'll deactivate it and remove your content from display (subject to backup and retention requirements).

In addition to the examples provided above, we offer other choices that you can learn more about with our support services.

You also have choices available to you through the device or software you use to access us. For example:

- The browser you use lets you control cookies or other types of local data storage.
- Your mobile device lets you choose how and whether your location, photos, advertising identifiers and other data is shared with us.

To learn more about these choices, please see the information provided by your device or software provider.

Changes to Privacy Policy

If the Company decides to change the privacy policy, the changes will be posted on this page, We will provide notices on the Website and in any other manner required, and/or update the Privacy Policy modification date above. If you continue to use our services after those changes are in effect, you agree to the new policy. If the changes are significant, we may provide a more prominent notice or get your consent, as required by law.

Contacting Us

For further questions or requests (including requests to receive a copy of any personal information that the Company holds about you) regarding this Privacy Policy you may contact the Company using the information below:

by email: info@norismedical.com

by telephone at: +972-73-796-4477 Fax: +972-4-695-0991; or

by sending a letter to Noris Medical Ltd., 8 Hataasia st., Nesher 3688808, Israel