



Privacy Policy

altshare Ltd. Privacy Policy Last Revised: October 12, 2023 (“altshare”, “We”, “Us”, “Our”) is providing this full Privacy and Cookie Policy (“Privacy and Cookie Policy” or “Policy”) that details how Personal Data is used and processed by altshare in the operation of Our Website and provision of Our Services.

1. Definitions

- 1.1. **"Applicable Laws"** shall mean EU Privacy Laws to the extent applicable to altshare, Israeli Data Protection Legislation, and any other applicable privacy law to which altshare is subject.
- 1.2. **"EEA"** shall mean the European Economic Area.
- 1.3. **"EU Privacy Laws"** shall mean the GDPR and or European Union Member State laws, rules and guidelines implementing or supplementing the GDPR, including without limitation the UK GDPR, to the extent applicable to altshare.
- 1.4. **"GDPR"** shall mean Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation), and as amended, replaced or superseded from time to time.
- 1.5. **"Israeli Data Protection Legislation"** shall mean the Israeli Privacy Protection Law 5741 - 1981 (**"PPL"**), the regulations promulgated pursuant thereto and the applicable guidelines issued by the Israeli Privacy Protection Authority, and as amended, replaced or superseded from time to time.
- 1.6. **"altshare" or "AS Group"** shall mean Altshare LTD, ALT-SHARE INC, and any other entity controlling, controlled by or under the common control with any of the foregoing entities or their controlling shareholders; the term "control", for the purpose of this definition, shall mean direct or indirect possession of the power to direct or cause the direction of the management or policies of any entity, whether through the ability to exercise voting power, by contract or otherwise.
- 1.7. **"Data Subject"** shall have the meaning ascribed to it in the GDPR, and shall include the term "Person" used in the PPL and any category of individuals defined herein that altshare processes their Personal Data, such as Visitors or Users or Customer Representatives (as defined below).
- 1.8. **"Controller"** shall have the meaning ascribed to it in the GDPR and shall include the term "Database Owner" under the PPL.
- 1.9. **"Processor"** shall have the meaning ascribed to it in the GDPR and shall include the term "Database Holder" under the PPL.
- 1.10. **"Subprocessor"** shall mean any entity appointed by Us or by one of Our Subprocessors, to Process Personal Data on Our behalf or on behalf of that Subprocessor; excluding any



employee of altshare or of altshare's Subprocessor or of any such appointed person but including any contractor or affiliate of the foregoing.

- 1.11. **"Customer"** shall mean an individual, company, enterprise, business or other entity that has an agreement with altshare for the provision of Services.
- 1.12. **"Services"** shall mean financial services, including, but not limited to: share and equity based benefit schemes, paying agent services, escrow agent services, tax withholding agent services or lockup and restructuring services.
- 1.13. **"Visitor"** shall mean a Data Subject that is browsing Our Website, whether that Data Subject is a User (as defined below) or not.
- 1.14. **"User(s)"** shall mean Data Subjects who are either i) participating in a share and equity based benefit scheme offered to them by a Customer they are a member of, work at, are employed by, or are otherwise affiliated with, or; ii) any individual receiving Services from altshare directly or through a Customer. (For easy reference, a Customer is any entity which has an agreement with altshare for the administration of a share and equity based scheme, see Section 1.11.
- 1.15. **"Customer Representatives"** shall mean Data Subjects, who are affiliated with, work at, are employed by, or are a member of a Customer (to which altshare provides Services), whose details are provided to altshare in connection with the provision of the Services or who may be authorized to use the Platform, if applicable.
- 1.16. **"Personal Data"** shall have the meaning ascribed to it in the GDPR and shall also include the terms "Information" and "Sensitive Information" as defined under the PPL. To put it simply, this information may identify an individual or is of a private and/or sensitive nature, such as Your name, address or bank account.
- 1.17. **"Personal Data Breach"** shall mean a breach of security or other incident leading to the accidental or unlawful destruction, loss, alteration, the unauthorized disclosure or use of, or access to, or harm to the integrity of, Personal Data transmitted, stored or otherwise Processed, as defined in the GDPR and shall also include all types of Information Security Events detailed in Israeli Data Protection Legislation.
- 1.18. **"Platform"** shall mean Our online Platform available at <https://cfo.altshare.com/account/login> through which we administer some of Our services.
- 1.19. **"Website"** shall mean the section dedicated to altshare at AS Group's website, available at <https://www.altshare.com/> and any other part of the AS Group's website.
- 1.20. **"European Commission" and "Processing"** shall have the meanings ascribed to them in the GDPR.
- 1.21. **"Database Owner", "Database Holder", "Database", "Database Manager", "Information Security Event"** shall have the meanings ascribed to them in the Israeli Data Protection Legislation.



2. Who We are

In this Policy, references to altshare, or to “We” or “Us” or “Our” are to altshare Ltd., which is a registered company in the State of Israel (No. 513890285) at 19A Habarzel Street, Tel Aviv 6971026, Israel and ALT-SHARE INC which is a registered company in the State of Delaware (No. 37-2015270) at P O BOX 77811 2 MASS AVE. NEWe can be contacted about this Policy at: cs@altshare.com

3. What are the categories of Data Subjects whose Personal Data we may Process?

altshare Processes the Personal Data of the following types of Data Subjects:

- 3.1. Visitors (to the Website)
- 3.2. Users (of the Platform)
- 3.3. Customer Representatives

Please note that when altshare processes Personal Data on behalf of its Customers it acts as a Processor and will process the Personal Data in accordance with the instructions of the applicable Controller and not in accordance with the provisions of this Policy.

4. Which categories of information do we collect?

We may collect from Data Subjects two types of information:

- 4.1. **Non-personal Data.** This means non-identifiable and anonymous data. To put it simply, We have no idea what is the identity of a Data Subject from which we have collected the Non-personal Data. Non-personal Data, which is being collected, consists of technical information and behavioral information that does not pertain to a specific individual. For example, technical information may include the name, type and version of the Data Subject’s device and its operating system, the type of browser, screen resolution, device browser and keyboard language, Wi-Fi connectivity, etc. Behavioral information may include the Data Subject’s click-stream, and additional information of a similar nature. We may collect Non-Personal Data on Our Website, by using cookies and analytics tools as detailed in our consent management tool.
- 4.2. **Personal Data.** This means data that can be used to identify a specific individual.

a) **Personal Data which is provided voluntarily:**

Activating a User’s/ Customer’s Account and registration to the Platform: if you are a User or a Customer Representative, and you wish to activate a User’s/ Customer’s Account on the Platform during your Account’s activation process, you will be required to provide Us with certain Personal Data (which may include your full name, identification/ passport number, address, and employee number, email address and password).

User’s and Customer Representatives’ Communications with altshare: Users and Customer Representatives may provide Us Personal Data such as their name, phone number, employer and account information as part of any communication with altshare through phone, fax, email or any other means of communication, including by contacting Our customer services. We may record or otherwise save such communications for quality assurance purposes and in order to improve Our services.

Contact Form: information you provide Us when filling the Contact Form available on Our Platform or the Website. The Contact Form may require you to provide the following details:



full name, e-mail address, phone number, and any other information you choose to provide in the free text box.

b) Personal Data collected through technology:

Technical and behavioral information: to the extent that the technical and behavioral information detailed above under “Non-personal Data” may be linked to or associated with a specific individual then such information will no longer qualify as Non-Personal Data and will be considered as Personal Data as long as such connection, linkage or association exists.

On our Platform, We issue a JWT Token in order to verify Users and We also collect, track and retain a log of access attempts according to the Internet Protocol (IP) addresses of Users (though such IP address is not linked to a User) for purposes of security and fraud prevention. In AS Group’s Website, We use cookies and third party’s analytics tools which allow us to collect aggregated statistical data about Users, which may contain Personal Data. For more information about the Personal Data collected through cookies and analytics tools, please see as detailed in our consent management tool.

c) Personal Data collected from a Customer:

If you are a User, please note:

We may process Personal Data about Users provided to us by the User, in relation to a share and equity based benefit scheme or other Services. The categories of Personal Data about the Users will normally include, amongst others, their name, identification/passport number, copies of identification documents, (including information which may be included therein such as date and place of birth, citizenship, family members, marital status), contact details, the number of shares/options allocated to each User, data about the transfer of payments to the User in the event of dividends and sales of shares and options to/by the User in relation to other Services. We may also Process your bank account number, tax information and other financial details. The Personal Data We collect may vary depending upon the Service to Our Customer or to you and may include additional information such as copies of agreements to which you are a party, share certificates, payments you are about to receive or amounts of your investment, etc.

d) Personal Data collected from AS Group’s Databases:

We collect Personal Data from AS Group’s registered Databases for the purposes mentioned in Section 6 **“Legal Basis for Processing”** below; under the title “Note to Israeli Data Subjects” in accordance with the permitted purposes of the AS Group’s registered Databases and with Israeli Data Protection Law.

5. What are the purposes of the collection and processing of information?

5.1. Personal Data is processed for the following purposes:

Except if specifically mentioned otherwise, please note that altshare will only Process Personal Data for the purposes for which it was collected:

- a) Register and administer Your Platform Account;
- b) Carry out Our obligations arising from any agreement entered into between altshare and Our Customer and providing the Services. Please note that such obligation may include,



depending on the specific Services, full disclosure of any Personal Data collected from you and/or processed to Our Customer;

- c) Enable the operation of the Platform and/or Website;
- d) Personalize your experience on the Platform and/or Website;
- e) Ensure that content on the Platform and/or Website is presented in an optimal way for you and for your device (e.g. tablet, mobile phone);
- f) Send you: i) updates, notices, announcements in relation to your Account and information related to the Platform and/or Website or the Terms of Service; and ii) information with respect to changes made to Our Platform's or Website terms of use and privacy policy; iii) transmission of marketing information. The emails and messages under i) and ii) are considered part of the Services and you may not opt-out of them. The emails and messages under iii) will be subject to your prior consent, if required in your jurisdiction and in any event you can always opt out by choosing not to receive future promotional, advertising, or other marketing-related emails from Us by selecting an unsubscribe link at the bottom of each email that We send;
- g) Conduct internal operations, including troubleshooting, data analysis, testing, research and statistical purposes;
- h) Keep the Platform or Website safe and secured and for prevention of fraud and crime;
- i) Comply with Our legal obligations and in particular, to comply with Israeli and EU Anti-Money Laundering (“**AML**”) legislation and in order to perform Know-Your Customer (KYC) procedures deriving from such AML legislation; to comply with international and Israeli tax legislation, such as Foreign Account Tax Compliance Act (FATCA) and other Applicable Laws.
- j) Protect Our rights and legitimate interests, including in order to improve the Platform and/or Website.
- k) Offer other services of the AS Group companies.

6. **Legal Basis for Processing**

Note to our Data Subjects in the EU (“You”):

In order for altshare to Process Your Personal Data, such processing must be justified by a "legal basis" for Processing. Please note that the Our Personal Data Processing operations may be justified on the basis that:

- 6.1. the Processing is based on Your consent (i.e. where you provided Us with consent to a specific type of data processing purpose);
 - 6.2. the Processing is necessary for the performance of a contract between You and altshare (e.g. we provide You with paying agent or withholding agent services);
 - 6.3. the Processing is necessary to enable Us to comply with a legal obligation (e.g. disclosure of information to authorities or tax deduction); or
 - 6.4. the Processing is in Our legitimate interests, subject to Your interests and fundamental rights.
- If You have any question or require any clarifications regarding the basis for Processing of Your Personal Data, please refer to Us, as applicable.



Note to non-EU Data Subjects: BY ENTERING, CONNECTING TO, ACCESSING OR USING THE PLATFORM AND/ OR THE WEBSITE, YOU CONSENT TO THE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION AS SPECIFIED HEREIN.

Note to Israeli Data Subjects: BY ENTERING, CONNECTING TO, ACCESSING OR USING THE PLATFORM AND/ OR THE WEBSITE, YOU CONSENT TO THE COLLECTION AND PROCESSING OF YOUR PERSONAL DATA AS SPECIFIED HEREIN, AND THAT THE PERSONAL DATA COLLECTED BY US SHALL BE MAINTAINED IN OUR OR AS GROUP COMPANIES' DATABASES REGISTERED IN ACCORDANCE WITH ISRAELI DATA PROTECTION LEGISLATION. The purposes for processing your Personal Data are: for the provision of the Services; management, operation and marketing of AS Group's services; management and improvement of the Services and Our contact with Customers; data cleansing; generating data for statistical, marketing and operational purposes; proposing content and services of the AS Group including direct marketing; receiving services such as IT services on a group level and transfer of your Personal Data to third parties for the foregoing purposes or as required by Applicable Law.

7. Sharing Information with Third Parties

- 7.1. altshare respects the privacy of Data Subjects and will not disclose, share, rent, or sell Personal Data to any third party, other than as permitted under this Privacy and Cookie Policy.
- 7.2. altshare will share your Personal Data with another entity or individual (such as a third party service provider) as permitted by Applicable Laws.
- 7.3. We may share Your Personal Data in the following cases:
 - a) AS Group companies- We may share Personal Data with AS's Group companies, with the express provision that their use of such Personal Data must comply with this Policy. The main purposes for processing your Personal Data by AS Group companies are: data cleansing; proposing content and services of the AS Group including direct marketing; receiving services such as IT services on a group level.
 - b) Service Providers: We may share Personal Data with vendors, consultants and data processors who perform Services on Our behalf solely for the purposes of i) enabling the operation of the Platform and/or Website; ii) carrying out Our obligations arising from any agreement entered into between altshare and Our Customer for the provision of Services for settlement of shares and/ or funds. Such Service Providers may include without limitation, companies that provide analysis, messaging services, IT services and services that host the Platform and/ or the Website or data. For more information regarding Our Service Providers, please refer to Section 7.5 below.
 - c) In addition, We may share Personal Data in the following cases:(a) to satisfy any Applicable Law, regulation, legal process, subpoena or governmental request; (b) to enforce this Privacy and Cookie Policy or any other agreement or terms of service between you and altshare and to defend against any claims or demands asserted against Us by you or on your behalf; (c) to detect, prevent, or otherwise address fraud, security or technical issues; (d) when altshare is undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of the assets of altshare (while such acquired company or investor may



be located in countries outside of your jurisdiction, provided such acquired company or investor undertakes to comply with the terms of this Policy).

- d) Sharing information with Authorities: We may need to disclose Personal Data in response to lawful requests by public authorities or law enforcement officials, including meeting national security or law enforcement requirements. We cooperate with government and law enforcement officials to enforce and comply with the law.

7.4. Third Party Service Providers

Note that We collect, hold and/or manage Personal Data through AS Group's authorized third party vendors of certain products or services (such as hosting services; including, as applicable, their affiliates and sub-processors) solely and limited to providing Us with such requested services, and not for any other purposes and subject to the third party service provider's compliance with privacy and data protection requirements.

- 7.5. For avoidance of doubt, ASItshare may transfer and disclose Non-personal Data to third parties at its discretion, including without limitation for statistical, analytical and research purposes and for customization, developing and improvement of our Platform or Website.

8. Your Rights

In this Section "You" refers to any Data Subject

- 8.1. In all of the above cases in which We collect, use or store Your Personal Data, You may have certain rights and, in most cases, You can exercise them free of charge. At any time, You have the right to contact Us at: cs@altshare.com.

Note to our Users who are Data Subjects in the EU:

We hereby inform you of the following rights (by virtue of EU Privacy Laws) with respect to the Processing of your Personal Data:

- a) 'Right to access: you may have the right to request a review of your Personal Data held by altshare.
- b) 'Right to rectification: if the Personal Data processed by altshare is incorrect, incomplete or not processed in compliance with Applicable Law or this Privacy Policy, you may have the right to have your Personal Data rectified.
- c) 'Right to erasure: under certain conditions, you may be entitled to require that altshare will delete or "block" your Personal Data (e.g. if the continued processing of a specific data is not justified or if the lawful basis for Processing is consent).
- d) 'Right to Portability: under certain conditions, you may have the right to transfer the Personal Data that you have provided to Us between data controllers.
- e) 'Right to object: where that lawful basis for processing your Personal Data is either "public interest" or "legitimate interests", those lawful bases are not absolute, and you may have a right to object to such processing.
- f) 'Right to withdraw consent: If the processing of your Personal Data is based on your consent, you have the right to withdraw your consent to such processing at any time. If you are a User to a share and equity based scheme, please refer to your employer (Our Customer) to



withdraw your consent. If you are a User, or if you receive from Us paying agent/withholding agent services, you may contact Us through the following email: cs@altshare.com

- g) 'The right to restrict processing – under certain circumstances, you may have the right to object to the processing of your Personal Data due to your particular situation.
- h) 'Right to lodge a complaint: You have the right to lodge a complaint before the relevant data protection authority or supervisory authority of your jurisdiction.

Note to our Users who are Data Subjects in Israel:

We hereby inform you of the following rights (by virtue of Israeli Data Protection Legislation) with respect to the Processing of your Personal Data:

- a) 'Right to access: unless a specific exemption applies under Israeli Data Protection Legislation, you may have the right to request a review of your Personal Data held by altshare and obtain a copy thereof.
- b) 'Right to rectification or deletion: if the Personal Data processed by altshare is incorrect, incomplete, unclear or outdated, you may have the right to have your Personal Data rectified or deleted.
- c) 'Right to withdraw consent: If the processing of your Personal Data is based on your consent, you have the right to withdraw your consent to such processing at any time. If you are a User to a share and equity based scheme, please refer to your employer (our Customer) to withdraw your consent. If you are a User, or if you receive from Us paying agent/withholding agent services, you may contact Us through the following email: cs@altshare.com

If you are a Data Subject in another jurisdiction - other rights may apply.

To exercise these rights, where applicable, please contact Us to the email address indicated above.

- 8.2. When You ask us to exercise any of Your rights under this Policy and the Applicable Law, we may need to ask You to provide us certain credentials to make sure that You are who You claim you are, to avoid disclosure to You of Personal Data to others and to ask You questions to better understand the nature and scope of data that You request to access.
- 8.3. We may redact from the data that we will make available to You, any Personal Data related to others.
- 8.4. .However, please note that these rights are not absolute and exercising them may be subject to applicable law and our legitimate interests.

9. Location of Your Personal Data and Data Transfers

- 9.1. The information collected from you by altshare, as detailed in this Privacy Policy, may be transferred to, and stored in, various sites worldwide, which may be located in countries outside of your jurisdiction and in a country that is not considered as offering an adequate level of protection under your local laws. Personal Data may also be processed by altshare and its suppliers, service providers or partners' staff operating outside your country.
- 9.2. Where the GDPR applies and We transfer Personal Data to another country outside the EEA, altshare is committed to protecting your Personal Data and will take appropriate steps to ensure that your Personal Data is transferred in accordance with Applicable Laws, as detailed in this Privacy and Cookie Policy.



Note to Israeli and other non-EU Data Subjects: BY SUBMITTING YOUR PERSONAL DATA THROUGH THE PLATFORM OR IN ANY OTHER MEANS OF COMMUNICATION TO ALTSHARE, YOU ACKNOWLEDGE, AND EXPLICITLY AGREE, IN A JURISDICTION WHERE SUCH CONSENT IS REQUIRED FOR TRANSFER OF YOUR PERSONAL DATA TO ANOTHER JURISDICTION, TO SUCH TRANSFER, STORING AND/OR PROCESSING OF PERSONAL DATA.

10. Minors

Our Services are intended for Users over the age of eighteen (18). Therefore, altshare does not intend and does not knowingly collect Personal Data from or about children under the age of eighteen (18) and does not wish to do so. We reserve the right to request proof of age at any stage so that We can verify that minors under the age of eighteen (18) are not using the Platform or the Website or Our Services. 12. Cookies and Analytical Tools.

11. Information Security

- 11.1. We take appropriate physical, technical and organizational measures to maintain the security and integrity of the Personal Data processed by Us, including in Our Platform, Website and information systems and to prevent damage, theft, unauthorized access to it or use thereof when it is in Our possession or control, through generally accepted industry standard technologies and internal procedures.
- 11.2. Please note, however, that although We make efforts to protect your privacy, 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 or other kinds of abuse and misuse will never occur.
- 11.3. altshare will comply with Applicable Law in the event of any Personal Data Breach and will inform the relevant Data Subjects of such Breach if required by Applicable Law.

12. Data retention

We retain different types of information for different periods, depending on the purposes for processing the information, Our legitimate business purposes as well as pursuant to legal requirements under the Applicable Law. altshare will retain Personal Data as necessary to comply with Our legal obligations such as tax obligations, to resolve disputes, and to enforce Our policies all subject to Applicable Laws.

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.

13. Changes to the Privacy

- 13.1. altshare reserves the right to change this Privacy at any time, so please re-visit this page frequently to check for any changes.
- 13.2. In case of any change, We will make reasonable efforts to post a clear notice on the Platform and/ or Website. Such material changes will take effect seven (7) days after such notice was provided on Our Platform or Website. Otherwise, all other changes to this Privacy and Cookie Policy are effective as of the “Last Revised” date posted on the Policy and your continued use of the Platform, Website or Services on or after the Last Revised date will constitute acceptance of, and agreement to be bound by those changes. In the event that We amend



the Policy to comply with any legal requirements, the amendments may take effect immediately, or as required by Applicable Law and without any prior notice.

14. Applicable Law and Dispute Resolution

- 14.1. This Policy shall be governed by and construed in accordance with the laws of the State of Israel, excluding its choice of law principals.
- 14.2. Disputes arising in connection with this Policy shall be subject to the exclusive jurisdiction of the competent courts in Tel-Aviv, Israel.

15. Have any Questions?

- 15.1. If You have any questions (or comments) concerning this Privacy and Cookie Policy, please send us an email to the following email: cs@altshare.com.
- 15.2. We will make good-faith efforts to address your concerns within a reasonable timeframe in accordance with Applicable Laws. If you are not satisfied with the response you receive from Us, you may escalate your concerns to the applicable privacy regulator in your jurisdiction. Upon request, We will provide you with the contact information for that regulator.