

# **SCR Privacy Policy for Website**

# **Privacy**

SCR is committed to protecting your privacy and your personally identifiable Data ("Personal Data"). SCR has created this Privacy Policy to let you know what Data (the "Data" – which includes, but is not limited to, Personal Data) SCR collects from you when you use the system provided by SCR (the "System"), how does SCR collect it and how does it use it. This Privacy Policy is part of and should be read in conjunction with the Terms of Use. When you access or use the System you agree that SCR may collect, use and disclose your Data in accordance with the terms of this Privacy Policy.

#### **Collection of Data**

SCR collects and stores Data from you, including without limitation, your name, farm or other physical address, email address, phone number, technical data other contact data, and any and all data generated by the System. SCR also collects and stores an activity log unique to you that collects certain administrative and traffic data including without limitation source IP address, time of access, date of access, web page(s) visited, language use, System crash reports, type of browser used, the technical operation of the System, and any data required to ensure your use of the System is compliant with the Terms of Use. SCR collects and stores the aforesaid Data when you visit or use the System and when you provide it to SCR, and also in your communications with SCR.

You are responsible for ensuring the accuracy of your Data you submit to SCR through the System. Inaccurate information will affect the information you receive when using the System and SCR's ability to contact you as contemplated in this Privacy Policy as well as to provide you with the System the best manner possible.

#### **Lawful Bases for Processing**

We will only collect and process Personal Data about you where we have lawful bases. Lawful bases include, inter alia, consent (where you have given consent), contract (where processing is necessary for the performance of a contract with you (e.g. to deliver the services you have requested) and "legitimate interests".

Where we rely on your consent to process Personal Data, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object. If you have any questions about the lawful bases upon which we collect and use your personal data, please contact us (contact information provided below).

Your Personal Data shall only be processed fairly and lawfully, obtained only for specified, explicit, lawful, and legitimate purposes, and shall not be further processed in any manner incompatible with those purposes, shall be adequate, relevant and not excessive in relation to the purposes for which it is being collected and/or processed.

Personal Data shall not be collected or processed unless one or more of the following apply:

- You have provided consent;
- Processing is necessary for performance of a contract with you and SCR need to process your personal data to comply with SCR obligations under the contract;
- Processing is necessary for compliance with a legal obligation;

- Processing is necessary in order to protect your vital interests;
- Processing is necessary for legitimate interests of SCR or by the third party or parties
- to whom your Personal Data disclosed, except where such interests are overridden by your fundamental rights and freedoms.

#### Principals

Your Personal Data shall only be processed fairly and lawfully, obtained only for specified, explicit, lawful, and legitimate purposes, and shall not be further processed in any manner incompatible with those purposes, shall be adequate, relevant and not excessive in relation to the purposes for which it is being collected and/or processed.

### Rights with respect to your Personal Data

You have the right to request from the Company to correct or supplement erroneous, misleading, outdated, or incomplete Personal Data, For Personal Data that we have about you:

*Delete Data*: You can ask us to erase or delete all or some of your Personal Data (e.g., if it is no longer necessary to provide services to you according to our contractual obligations).

Change or Correct Data: you can edit some of your Personal Data through your account. You can also ask us to change, update or fix your data in certain cases, particularly if it's inaccurate.

Object to, or Limit or Restrict, Use of Data: You can ask us to stop using all or some of your Personal Data (e.g., if we have no legal right to keep using it) or to limit our use of it (e.g., if your personal data is inaccurate or unlawfully held).

Right to Access and/or Take Your Data: You can ask us for a copy of your Personal Data and can ask for a copy of personal data you provided in machine readable form.

# • Third Party Processors.

Where SCR relies on third parties to assist in its processing activities, SCR will choose a Data processor who provides sufficient security measures.

#### • Written Contracts for Third Party Processors.

Therefore SCR shall enter into a written contract with each Data processor requiring it to comply with Data privacy and security requirements imposed on the Company under local legislation.

#### **Use of Data**

SCR uses the Data it collects from or about you to make the System available to you, to conduct statistical analysis, provide customer support, to undertake necessary security and identify verification checks, to meet certain business requirements and for any other purpose related to the operation of the System. Your Data may also be used by SCR to provide you with promotional offers and information regarding products and services from third parties

(including by providing your Data, excluding Personal Data, to such third parties), and in order for SCR to improve the System and/or customer service. SCR may also use the Data to track your use of the System and/or for other internal purposes, such as evaluating, providing, and improving the System.

### **Sharing and Transfer of Your Data**

Data SCR collects and receives may be disclosed to third parties (i) as described in this policy; or (ii) if you have requested and/or agreed that the Data will be provided to these third parties; or (iii) if the disclosure is required by law; or (iv) if it is transferred for the performance of a contract between you and SCR; or (v) the transfer is necessary in order to protect the vital interests of the Data Subject; or (vi) the transfer is necessary or legally required on important public interest grounds, or for the establishment, exercise, or defense of legal claims. SCR may disclose your Data to associated entities and/or to third parties, at SCR's sole discretion, where the purpose of such disclosure is to provide you with the System and to improve the System as part of compliance with contractual duties between us. In addition, SCR may disclose your Data if SCR believes in good faith that such action is necessary to comply with applicable legislation, a current judicial proceeding, a court order or legal process, or to protect and defend SCR's (or its licensor's) rights or property, the personal safety of other users of the System or the public at large. SCR reserves the right to share the Data with appropriate authorities and financial institutions, if SCR determines in its sole you are attempted to defraud SCR, or if SCR suspects you are committing any fraudulent activity, or any other prohibited transaction, or if you breach the Terms of Use.

In the event that SCR sells, assigns or transfers some or all of its business or assets to a successor

or acquirer, or if SCR is acquired by or merge with a third party, or if SCR files for bankruptcy or becomes insolvent, SCR may disclose, sell, assign or transfer all of your Data, regardless of your opt status, to such successor or acquirer as part of the transaction.

As abovementioned SCR may transfer your Data to jurisdictions outside your jurisdiction of residence and/or outside the European Union/ the European Economic Area. The data protection and privacy laws of the jurisdictions to which the Data will be transferred may not be as comprehensive as those in the European Union (if applicable to you); in which case SCR will take measures to ensure a similar level of protection is provided to your Data. If your Personal Data is obtained while you are in the EU, your Personal Data shall not be transferred to a country or territory outside the EU unless the transfer is made to a country or territory recognized by the EU or any other EU authorized body according to the GDPR, as

# Choice / Opt-Out

having an adequate level of data security.

Each communication sent to you by SCR includes a simple and free mechanism allowing you to opt out from receiving communications from SCR.

#### **Cookies**

SCR uses a browser feature known as cookies, which are small text files which are placed on your computer or equipment when you visit certain online pages, to track your activities, record your preferences, and make the System more responsive to your needs by delivering a better and more personalized experience to you.

# Security

SCR has implemented suitable security policies, rules and technical measures to protect and safeguard the Personal Data under its control from unauthorized access, improper use or disclosure, unauthorized modification, unlawful destruction or accidental loss. SCR may use third party vendors and hosting partners to provide the necessary hardware, software, networking, storage, and related technology required to provide the service. These may be located at destinations outside the European Economic Area. By submitting your Personal Data, you agree to this. All of SCR's employees and data processors that have access to, and are associated with the processing of your Personal Data, are obliged to respect the confidentiality of your Personal Data. However, we cannot guarantee the security of your data, which may be compromised by unauthorized entry or use of the System.

Appropriate physical, technical, and procedural measures shall be taken to:

- Prevent and/or to identify unauthorized or unlawful collection, Processing, and transmittal of Personal Data; and
- Prevent accidental loss or destruction of, or damage to, Personal Data.

#### • <u>Security Incident Notification</u>

If SCR become aware of any unlawful access to Personal Data we stored, or unauthorized access to it, resulting in loss, disclosure, or alteration of the Personal Data, we will promptly (1) notify you of this security incident; (2) investigate this security incident and provide you with detailed information about the security incident; and (3) take reasonable steps to mitigate the effects and to minimize any damage resulting from the security incident. Notification(s) of those security incidents will be delivered to you by any means we selects, including via email. It is your sole responsibility to ensure you maintain accurate contact information. SCR obligation to report or respond to such security incident is not an acknowledgement by us of any fault or liability with respect to a security incident. You must notify us promptly about any possible misuse of your accounts or authentication credentials or any security incident related to the services that we providing to you.

#### **Links to Other Sites**

The System may contain links to other sites. Other sites may also reference or link to the System. SCR is not responsible for the privacy practices or the content of such other online sites, and any Data collected by these third party online sites is not governed by this Privacy Policy, and SCR assumes no responsibility or liability whatsoever for the policies (including privacy policies), practices, actions or omissions of such third parties.

#### **Retention and Deletion of Your Data**

SCR may retain your Data for as long as needed to provide you with the services described in the Terms of Use. This often means that SCR will keep Data for the duration of your account, which may be terminated in accordance with the Terms of Use. Please note, however, that where applicable legislation requires SCR to do so, it may be required to keep records of your Data even after such termination.

# **Contact Information**

If you have questions or complaints regarding this Privacy Policy, please first contact us <u>online</u>. You can also reach us by phone +972-(0)73 2466123. .

SCR (Engineers) Ltd.

18 Hamelacha St., Netanya, Israel email: <a href="mailto:info@scrdairy.com">info@scrdairy.com</a>

# Your Acceptance of this Policy

By agreeing to the Terms of Use during the registration process on the System or the website as applicable, you agree to this Privacy Policy, and to any changes SCR may make to this Privacy Policy from time to time — without the need to notify you about such changes; SCR reserve the right to alter the privacy policy at any time -it is recommended that you revisit this Privacy Policy regularly so as to be kept apprised of the updated Privacy Policy. Your continued use of the System following changes to this Privacy Policy means you accept these changes. If you do not agree to the altered privacy policy, you may stop using the System.

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