

Privacy Policy - Aura Renewing Israel Ltd.

1. Introduction

- 1.1. This Privacy Policy (hereinafter: the “**Policy**”) is intended to clarify the manner in which Aura Renewing Israel Ltd. (including subsidiaries and affiliated companies, hereinafter: the “**Company**”) collects, holds, uses, and processes, stores, and protects information relating to users of the Company’s internet websites, digital applications, and any other online service operated by it (hereinafter: the “**Website(s)**” and the “**Services**”).
- 1.2. The Policy details which information is collected by the Company, including personal information as defined in the Protection of Privacy Law, 5741–1981 (hereinafter collectively: the “**Information**”), and the manner in which such Information is used by the Company.
- 1.3. The Policy further includes details regarding the use of technological tools and other aspects relating to the collection, use, and transfer of the Information.
- 1.4. Use of the Services constitutes consent to the provisions of this Policy. A user who does not agree with the Policy is requested not to use the Services.
- 1.5. The Policy is drafted in the masculine form for convenience only and applies to all genders.

2. Identity of the Company and the Database Owner and Contact Details

- 2.1. The owner of the database is Aura Renewing Israel Ltd., address: 132 Menachem Begin Street, Tel Aviv, Triangle Tower, 40th Floor, telephone: *5997.
- 2.2. For inquiries regarding privacy and the exercise of rights, contact may be made via email at: yakirj@auraisrael.co.il, the Data Protection Officer.
- 2.3. The Policy applies to all domains and applications of the Company.

3. Consent to the Provision of Information and Consequences of Non-Consent

- 3.1. Unless otherwise stated, there is no legal obligation to provide Information, and its provision depends on the user’s free will. However, refraining from providing required Information may prevent the Company from providing all or part of the Services.
- 3.2. Certain details may be required to be provided by the user or received by the Company pursuant to specific legal provisions (to the extent applicable).
- 3.3. Use of the Services constitutes consent to the collection, use, disclosure, transfer, and retention of Information in accordance with this Policy.

4. Sources of Information

The Company collects information from the following sources:

- 4.1. Information provided by the user upon inquiry, registration, completion of forms, contacting the Company, and the like.
- 4.2. Information generated through use of the Services (including usage and operational data).
- 4.3. Information from authorized third parties, service providers, public sources (websites/social networks), and analytics/advertising providers, subject to applicable law and relevant consents.
- 4.4. Where the user provides information regarding third parties (for example, family members or representatives), the user represents that he has notified them and obtained the required consent for the provision and processing of such information in accordance with this Policy.

5. **Types of Information Collected**

- 5.1. Identification and contact details: full name, telephone/mobile number, email address, address, website account identifiers, and the like.
- 5.2. Operational/business information: details regarding services requested and/or provided, records of inquiries and support.
- 5.3. Communication records: subject to applicable law, textual/audio/visual documentation of interactions (for example, email/chat/call center inquiries).
- 5.4. Automatically generated technical log information: IP address, browser type, operating system, device identifiers/cookies, usage/navigation data, approximate location (if enabled and consented).
- 5.5. Any additional information provided by the user or received in connection with use of the Services.

6. **Purposes of Use of Information**

The Company uses the Information for the following purposes:

- 6.1. Provision of Services, handling inquiries, and customer relationship management.
- 6.2. Operation, maintenance, improvement, and development of the Services and websites.
- 6.3. Customization of user experience, segmentation/statistical analysis, surveys, and market research.
- 6.4. Marketing, advertising, and direct mailing, subject to consent and/or applicable law.
- 6.5. Information security, fraud prevention, monitoring, and safeguarding the integrity of the Services.
- 6.6. Compliance with any applicable law and protection of the rights of the Company and/or third parties.
- 6.7. Data-driven operational/commercial decision-making; use of analytical models to mitigate risks (where applicable).

7. **Processing by Automated Means and Artificial Intelligence (AI)**

- 7.1. The Company may process Information by automated/computerized means (including machine learning and artificial intelligence) for purposes of data analysis, process automation, service improvement, anomaly detection, and generation of insights.
- 7.2. To the extent that actions are taken to transform identifiable information into non-identifiable information, such actions shall be carried out in accordance with applicable law.
- 7.3. To the extent automated decisions that have a material impact on the user are made, appropriate transparency shall be provided, and the option for human review shall be afforded, to the extent required by law.

8. **Transfer of Information to Third Parties and Abroad**

The Company does not sell personal information to third parties. However, the Company may transfer personal information in the following cases and to the following recipients, only to the extent required and for the purposes specified in this Policy, and subject to the provisions of any applicable law:

- 8.1. Technology and information security service providers, including cloud services, hosting, technical support, backup, and systems maintenance services.
- 8.2. Electronic mailing and message distribution service providers (such as Mailchimp systems or equivalents), for purposes of customer communications and delivery of content in accordance with consent.
- 8.3. Customer relationship management (CRM) systems and external service centers, for the purpose of managing and developing customer relations.
- 8.4. Digital advertising and marketing platforms and analytical systems such as Google, Meta/Facebook, Taboola, Outbrain, and others, for purposes of measurement, segmentation, and customization of content and services, in accordance with applicable law.
- 8.5. Professional advisors, including accountants, attorneys, and information security consultants, acting on behalf of and for the benefit of the Company.
- 8.6. Authorized authorities or public bodies, where the Company is required to do so pursuant to law or a judicial order.
- 8.7. Structural change, merger, or assignment or transfer of activity, provided that the receiving party undertakes equivalent data protection obligations.

9. **Use of Cookies and Tracking Technologies – Cookies, Pixels**

- 9.1. The Website uses cookies and similar technologies (pixels, web beacons, SDKs) for operational, security, analytics, and marketing purposes.
- 9.2. Types of cookies: essential; analytical; functional; marketing/targeting.
- 9.3. The user may manage preferences via the browser/device and may also use industry opt-out tools (such as: <https://tools.google.com/dlpage/gaoptout>).

aboutads.info/choices, youronlinechoices.eu). Blocking may impair the user experience.

- 9.4. The Company may utilize third-party advertising and analytics platforms (for example, Google, Meta/Facebook, Taboola, Outbrain, LinkedIn, TikTok, Appsflyer, Google Tag Manager/Signals, Firebase), in accordance with the privacy policies of those companies and subject to applicable law.

10. **External Links and Resources**

The Website may include links/banners/references to websites or services that are not under the Company's control. The Company is not responsible for their content, security, or privacy policies. It is recommended to review the privacy policy of each third party prior to providing personal information.

11. **Information Security**

- 11.1. The Company employs reasonable and customary organizational, technological, and administrative measures to protect the Information against unauthorized access, misuse, alteration, or any disclosure.

12. **Information Retention Period**

13. The Information shall be retained for the period required to achieve the purposes detailed above or as required by law.

14. **Rights of Data Subjects**

- 14.1. Access to and rectification of personal information shall be in accordance with the provisions of the law. If the user wishes to access or rectify his personal information, this may be done in accordance with applicable law by submitting a written request to the Company pursuant to the contact details specified in this Policy.
- 14.2. The Company may reject a request in accordance with the provisions of law (for example, where there is an obligation to retain information or where a prevailing legitimate interest exists).

15. **Miscellaneous**

- 15.1. Nothing in this Policy shall derogate from any right granted to the Company under any law.
- 15.2. The user may not assign his rights/obligations under this Policy; the Company may assign/transfer its rights/obligations in the context of a structural/corporate change, provided that the protection principles set forth in this Policy continue to apply.
- 15.3. Applicable law: the laws of the State of Israel; exclusive jurisdiction: the courts in the Tel Aviv–Yafo District.

- 15.4. The Company may update the Policy from time to time; material changes shall be published on the Website. Continued use of the Services following an update constitutes consent to the updated Policy.

16. **Contact**

For questions and inquiries regarding privacy and the exercise of rights: email: yakirj@auraisrael.co.il

Address: 132 Menachem Begin Street, Triangle Tower, 40th Floor, Tel Aviv - Yafo

Telephone: *5997

Last updated: November 2025