Lightricks Privacy Policy

Lightricks Ltd., including our subsidiary and affiliates worldwide ("Lightricks", “we”, “our” or “us”), puts great efforts in making sure that the personal data we process is safe and used properly, and that our data practices are accurately communicated to our prospects, and users (collectively “you” or “your”).

Lightricks offers a number of mobile software applications (each, an "App") and web services (each, a "Web Service"), allowing you, amongst other things, to edit and perfect photos, create images, add filters, create a landing page within your biographic description ("Link in bio"), edit videos and share your creations through social media and email, as well as within Lightricks apps ("Lightricks Feed"). Lightricks also operates various websites (each, a "Website").

This Privacy Policy ("Policy") describes how we collect, store, use and disclose the following types of personal data:

Prospect data concerning our website visitors, prospective affiliates and others who visit, use or engage with our website, blogs or other similar forums, online ads and content, surveys, emails or other communications under our control.

User data concerning individuals (“Users”) who download and register to the Lightricks’ Apps (together with the Sites – the “Services”).

Specifically, this Privacy Policy describes our practices regarding:

1. Data Collection
2. Data Uses
3. Data Location
4. Data Retention
5. Data Security
6. Data Sharing
7. Cookies and Tracking Technologies
8. Communications
9. Data Subject Rights
10. Roles and Responsibilities
11. Additional Information and Contact Details

This Privacy Notice (the "Notice") describes how we collect, use, store and otherwise process personal data that we collect or receive from or about you. Please read this Privacy Policy carefully and make sure that you fully understand and agree to it. You are not legally required to provide us with any personal data and may do so (or avoid doing so) at your own free will. If you do not wish to provide us with your personal data or to have it processed by us or any of our Service Providers (per Section 6 below), please avoid any interaction with us or any use of our Services.

1. DATA COLLECTION

The data we process regarding our Prospects and Users is typically collected and generated through automatic means, directly from you, through your interaction with us or with our Services; from our Users; or through third-party services, social media, analytics tools, events we organize or take part in, and other business initiatives.

Such data may include:
- **Account information:** e-mail address, name, user name, nickname, date of birth, gender, social media accounts, subscription status (including a token indicating payment of the subscription and payment method) and additional optional information such as profile photo and hashed password or other information used for authentication and access control. You may also choose to login to our Apps and Services using your Apple, Facebook or Gmail account. By doing so, you provide us with information connected to such an account which may also include your name, profile picture, friends list, language preferences, demographic data, location, account ID number/token, and email address. Please note, Lightricks doesn't have control over how any third party uses or discloses the personal data it collects about you.

- **Photographs/Videos:** As a general rule, all photos and videos on your device will remain stored on your device. However, our certain Services contain the functionality which allows you, as an account owner, to upload images or videos to the Lightricks Feed will be stored on Lightricks' servers ("Lightricks Cloud"). In such cases, we will collect the images and videos you upload to the Lightricks Cloud, which may also include Face Data and Analytical Information (see definition of this term below).

- **Services usage information:** connectivity, technical and aggregated usage data, user agent, IP addresses, device data (such as type, OS, device ID, browser version, locale and language settings used), access times and dates logs, communication and performance logs, session recordings, issues and bugs, and the cookies and pixels installed or utilized on your device.

- **Image Data:** The Apps allow users to use special functions that are designed for editing and processing images and videos, including identifying the characteristics of images of people and faces. We collect and process information on the characteristics of images and videos that you have in your camera roll to which you choose to grant the Web Service and App access, such as the image setting (e.g., sunset, indoor, party), the posture, location and characteristics of faces or other face parts (eyes, lips, etc.) that appear in an image or video, and the number, estimated age and gender of people in the image or video ("Content Information"). For more details on where and how we store your personal data, please see the “Security and Data Retention” section below. Our Apps can also recognize the faces of people in your photos ("Face Data"). This identification process is conducted on your device. We do not collect or retain any biometric information or biometric identifiers from your images.

- **Direct interactions and communications:** messages, comments, feedback (e.g., internal communications), as well as correspondence with us, (e.g., for user enablement, support and training purposes), including chats, surveys, calls and video recordings, transcriptions, and analyses thereof, and any other data you choose to provide or upload via the Services or in the context of the interaction with one of our customer experience representatives.

- **Lightricks Feed:** On the Lightricks Feed, Lightricks will process personal data such as profile photos, names, emails, social media accounts, reactions to feed posts and comments to feed posts.

- **External Profile (“Link in bio”):** As part of its Web Services, Lightricks allows users to host an external linkable profile on its servers, which is called Link in bio.
  - A Link in bio profile might include links to other social media accounts of the user, users’ full name, email, pictures websites, blogs or other communication methods. In addition, you can add features and integrations to the Link in bio, such as Topjar, Zoom call links, subscription and purchasing off content or merchandise, which may contain your personal data or links to external sources which contain your personal data.
If you sell anything via Link in bio (e.g. merchandise), Lightricks may hold details of completed transactions such as date, amount, transaction ID. Lightricks will not store credit card information.

- If you decide to add subscription or other features which collect personal data from other users via the Link in bio, it is up to you to make sure that the collected personal information is being collected according to relevant privacy and data protection legislation.

2. DATA USES

Lightricks processes the personal data described in Section 1 as necessary for the performance of our Services; to comply with our legal and contractual obligations; and to support our legitimate interests in maintaining, improving and advertising our Services. These include understanding how our Services are used, and how our Services, campaigns and other activities are performing; gaining insights which help us dedicate our resources and efforts more efficiently; marketing, advertising and selling our Services; providing customer service and technical support to our users; and protecting and securing our Services, ourselves and the organizations and individuals we engage with.

Lightricks operates in many countries around the world. Therefore, please note that if you reside or are using the Services in a territory governed by privacy laws under which "consent" is the only or most appropriate legal basis for the processing personal data in the manners described in this Policy (in general, or specifically with respect to the types of personal data you expect or elect to be or have processed by or via the Services), your acceptance of our Terms of Use and this Privacy Policy will be deemed as your consent to the processing of your personal data for all purposes detailed herein. If you wish to revoke such consent, please contact us at dpo@lightricks.com.

We do not sell your personal information for the intents and purposes of the California Consumer Privacy Act (CCPA).

Specifically, we use your data for the following purposes:

<table>
<thead>
<tr>
<th>Apps, Websites &amp; Link in bio User Personal Data</th>
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<th>Legal basis for processing</th>
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<tbody>
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<td>Providing our users with our Services, including the ability to edit their images, videos and media as well as other web services</td>
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<td></td>
</tr>
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<td>To create aggregated data, anonymized or pseudonymized data and/or De-identified Data</td>
<td>▪ Legitimate interest</td>
<td></td>
</tr>
<tr>
<td>To enrich the content and improve the features available within the Services – this includes the use of third-party apps that allows us to record user journeys and session and create heatmaps. User content won't be tracked</td>
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<td></td>
</tr>
<tr>
<td>To authenticate the identity of our Users, and to allow them to access our Services</td>
<td>▪ Legitimate Interest Performance of a Contract</td>
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To evaluate and develop new features, technologies, and improvements to the Service | Legitimate Interest

To perform, facilitate and optimize our marketing campaigns, ad management and sales operations, and to manage and deliver advertisements for our products and services more effectively, including on other websites and applications | • Legitimate Interest
• Consent

To explore and pursue growth opportunities by facilitating a stronger local presence and tailored experiences | Legitimate Interest

To contact our Website and Apps visitors, Users and Customers (whether existing or prospective) with general or personalized service-related messages, as well as promotional messages that may be of specific interest to them | • Legitimate Interest
• Consent

To facilitate, sponsor and offer certain events, contests and promotions | • Legitimate Interest
• Consent

To support and enhance our data security measures, including for the purposes of preventing and mitigating the risks of fraud, error or any illegal or prohibited activity | • Legitimate Interest
• Performance of a Contract

To create aggregated data, inferred non-personal data or anonymized or pseudonymized data (de-identified data), which we or our business partners may use to provide and improve our respective services or for any other purpose | • Legitimate Interest
• Performance of a Contract
• Compliance with legal obligations

To comply with applicable laws and regulations | Compliance with legal obligations

3. DATA LOCATION

We and our authorized Service Providers maintain, store and process personal data in the various locations we operate around the globe, including in Israel, the EU and the US, as reasonably necessary for the proper performance and delivery of our Services, or as may be required by law.

While privacy laws may vary between jurisdictions, Lightricks, its affiliates and Service Providers are each committed to protect personal data in accordance with this Privacy Policy, customary industry standards, and such appropriate lawful mechanisms and contractual terms requiring adequate data protection, regardless of any lesser legal requirements that may apply in the jurisdiction to which such data may be transferred. For data transfers from the EU we have entered into Standard Contractual Clauses (“SCC”), you can obtain a copy by contacting us as indicated in Section 12 below.

4. DATA RETENTION

We retain your personal data for as long as it is reasonably necessary to provide you with our Services and offerings and to maintain and expand our relationship; to comply with our legal and contractual obligations; or to protect ourselves from any potential disputes (e.g. as required by laws applicable to log-keeping, records and bookkeeping, and in order to have proof and evidence concerning our relationship, should any legal issues arise following your discontinuance of use), all in accordance with applicable laws and regulations. Please note that for many of our Services, Users may not use an App for a certain amount of time and still expect us to retain their personal data, such as their account information and photos. Therefore, we will generally retain your personal data for you until you instruct us to delete it. You may ask us to do so by emailing dpo@lightricks.com or by initiating the process in-App, if such option is available.
Please note that except as required by applicable law or our specific agreements with you, we will not be obliged to retain your personal data for any particular period, and we are free to securely delete it or restrict access to it for any reason and at any time, with or without notice to you. If you have any questions about our data retention policy, please contact us by e-mail at dpo@lightricks.com.

Please also note that we do not retain your payment information, it is transferred directly to the relevant Service Provider (as per Section 6 below). We only retain a token of such payment information (which cannot be used to reidentify it) and the chosen payment method.

5. Data Security

We implement appropriate technical, organizational, and security measures to reduce the risks of damage to (or loss of) information, or any unauthorized access or use of information. However, these measures do not provide absolute information security. Therefore, although efforts are made to secure your personal data, it is not guaranteed, and you cannot expect that the Services will be immune to information security risks or attacks. Also, as the security of information depends in part on the security of the computer, device or network you use to communicate with us, and the security you use to protect your user IDs and passwords. Please make sure to take appropriate measures to protect this information.

6. Data Sharing

Legal Compliance: in exceptional circumstances, we may disclose or allow government and law enforcement officials access to your personal data, in response to a subpoena, search warrant or court order (or similar requirement), or in compliance with applicable laws and regulations, with or without notice to you. Such disclosure or access may occur if we believe in good faith that: (a) we are legally compelled to do so; (b) disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing; or (c) such disclosure is required to protect our legitimate business interests, including the security or integrity of our products and Services.

Service Providers: we engage selected third-party entities to perform services complementary to our own. Such Service Providers include hosting and server co-location services, communications and content delivery networks (CDNs), internet service providers, operating systems and platform, data analytics services, marketing and advertising services, data and cyber security services, fraud detection services, billing and payment processing services, shipping and handling services, web analytics, e-mail and SMS distribution and monitoring services, session or activity recording services, remote access services, performance measurement, data optimization services, social and advertising networks, content providers, support and customer relation management systems; and our business, legal, financial and compliance advisors (collectively, “Service Providers”). These Service Providers may have access to your personal data, depending on each of their specific roles and purposes in facilitating, supporting and enhancing our Services, and may only use it for such purposes.

Third-Party Websites and Services (“Vendors”): our Services may include links to third-party websites, and integrations with third-party services. Such websites and third-party services, and any information you process, submit, transmit, store or otherwise use with such websites and third-party services, are beyond the scope of Lightricks’ terms of use and Privacy Policy and will therefore be governed by such third-party’s terms and privacy practices and policies, and not by this Privacy Policy. We encourage you to carefully read the terms and privacy policies of such websites and third-party services. Moreover, if the Services integrate with a third-party service, the application programming interface (API) that performs the integration will enable the relevant
third party to serve you certain content as well as access some of your Account Content. For example, if you wish to upload or otherwise share your Account Content to an integrated third-party service such as Instagram or TikTok, or to make use of certain functionality in those services, the API will enable the applicable third party to access your Account Content (such as your photo library). Additionally, when you pay for fee-based Services or items, your payment will be processed by third party payment processors, such as Google's or Apple's in-app purchase mechanism, or if you charge for merchandise through Link in bio this will be done via Stripe. While we do make significant efforts to only work with reputable companies which we have evaluated they take privacy seriously, we do not control, and are not responsible for, the privacy practices of such third parties, or for their content, products and services, and we encourage you to read the terms and conditions and privacy policies of each third party that you choose to use or interact with. These Vendors may also collect your personal data through their respective tracking tools incorporated or embedded within our Services. We use their services for the purposes set forth below.

**Protecting Rights and Safety:** we may share personal data with others if we believe in good faith that this will help protect the rights, property or personal safety of Lightricks, our Prospects, Users, Players, or any members of the general public.

**Lightricks Subsidiaries and Affiliated Companies; Change of Control:** we may share personal data internally within our group, for the purposes described in this Privacy Policy. In addition, should Lightricks Ltd. or any of its subsidiaries or affiliates undergo any change in control or ownership, including by means of merger, acquisition or purchase of substantially all or part of its assets, or will be considered or found eligible for a governmental grant and/or a potential investment, personal data may be shared with the parties involved in such an event. If we believe that such event might materially affect your personal data then stored with us, we will notify you of this event and the choices you may have via e-mail or prominent notice on our Services.

**In-App sharing:** due to the nature of the Apps and the Lightricks Feed feature, certain personal data available in the Apps is visible to other Lightricks Users in that App, for example your username and password, likes and comments on other Users' content. We will never share your photos or videos with other Users unless you actively choose to do so.

**SDKs:** We use third party software development kits (SDKs) and other similar technologies on our App and Web Service to ensure their stable operation and to provide the Services as described above. Please see below a list of SDK providers we use (which may be updated from time to time), and more information about our use and sharing of your personal information with our SDK providers. Some of these third-party SDK providers may collect personal data from you for their use and processing and may obtain your consent prior to doing so.

**Additional Sharing:** we may share your personal data in additional manners, pursuant to your request or explicit approval, or if we are legally obligated to do so, or if we have successfully rendered such data non-personal, non-identifiable and anonymous. We may transfer, share or otherwise use non-personal and non-identifiable data at our sole discretion and without the need for further approval.

### 7. Cookies and Tracking Technologies

We may use cookies, tracking pixels (also known as clear GIFs and web beacons) and other technologies for performance which are used to anonymously track the online usage patterns of users of the Services and in order to provide you with a better experience. In addition, we may also use tracking pixels in HTML-based emails sent to our users to track which emails are opened.
and which links are clicked by recipients. This information allows for more accurate reporting and improvement of the Services. We may share non-identifiable/aggregated extracts of such information with our partners for our legitimate business purposes.

Cookies: cookies are small text files that are stored through the browser on your computer or mobile device (for example, Google Chrome or Safari) when you visit a website. Some cookies are removed when you close your browser session - these are the “session cookies”. Some last for longer periods and are called “persistent cookies”. We use both types of cookies to facilitate the use of the Services' features and tools. Whilst we do not change our practices in response to a “Do Not Track” signal in the HTTP header from a browser or mobile application, you can manage your cookies preferences, including whether or not to accept them and how to remove them, through your browser settings. Please bear in mind that disabling cookies may complicate or even prevent you from using the Services. For more information regarding cookies, you may find the following websites useful: www.allaboutcookies.org, www.youronlinechoices.co.uk.

Google Analytics: we use Google Analytics to collect information about the use of our Services. Google Analytics collects information such as how often you visit the Services, which pages you visited when doing so, and which other sites they used prior to coming to our Services. We do not merge the information collected through the use of Google Analytics with personally identifiable data. Google's ability to use and share information collected by Google Analytics about your visits to and use of the Services is restricted by the Google Analytics Terms of Service and the Google Privacy Policy. You can learn more about how Google collects and processes data specifically in connection with Google Analytics here. Further information about your option to opt-out of these analytics services is available here.

Facebook Pixel Tags: This Platform uses pixel tags from Facebook. These tags provide information about e.g. a user's patterns of activity on the Platform, IP address, time of visit, and so on. This information can be used by Lightricks and/or Facebook to help target Lightricks' advertising. You can read more about Facebook's Pixel Tag policies here.

To learn more about our cookies practices, please visit our Cookie Policy.

8. COMMUNICATIONS

We engage in service and promotional communications, through e-mail, phone, SMS and notifications.

Service Communications: we may contact you with important information regarding our Services. For example, we may send you notifications (through any of the means available to us) of changes or updates to our Services (such as billing issues, login attempts or password reset instructions, alerts and notifications concerning anomalies detected by our Services, abandoned cart emails, surveys, etc.). You can control your communications and notifications in accordance with the instructions included in the communications sent to you. Please note that you will not be able to opt-out of receiving certain service communications which are integral to your use.

Notifications and Promotional Communications: we and our authorized may also notify you about new features, additional offerings, events, webinars, special opportunities or any other information we think you will find valuable. We may provide such notices through any of the contact means available to us (e.g., SMS, phone, mobile or e-mail), through the Services, or through our marketing campaigns on any other sites or platforms. Furthermore, If you contact us with an inquiry, we may respond with promotional emails relating to your inquiry. For example, if you contact us with an inquiry about a feature you would like to see on one of our Services, we will use your Contact Information to later inform you once our Services have been updated to include features similar to those you inquired about or other features you may be interested in. In order
to control your notifications settings- please follow the instructions included in the promotional communications sent to you. If you do not wish to receive such communication, you may also notify us by sending an e-mail to: dpo@lightricks.com or opt-out of these email updates by following the unsubscribe link located at the bottom of the email.

9. **DATA SUBJECT RIGHTS**

Individuals have rights concerning their personal data. If you wish to exercise your privacy rights under any applicable law, including the EU General Data Protection Regulation (GDPR), or the CCPA, such as the right to request access, rectification, or erasure of your personal data held with Lightricks, your right to restrict or object to such personal data's processing, or to port such personal data – please contact us by e-mail at: dpo@lightricks.com. Please be advised that deleting your personal data stored with Lightricks will adversely affect your use of our Services.

Should you ever decide to delete your Account, you may do so by emailing dpo@lightricks.com or by clicking on the delete account option in the App settings. If you terminate your Account, any association between your Account and personal data we store will no longer be accessible through your Account. However, given the nature of sharing on certain Services, any public activity on your Account prior to deletion will remain stored on our servers and will remain accessible to the public.

Please note that such rights are not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal data that we hold about you. In the event that we cannot accommodate your request, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

Please also note that we may require additional information, including certain personal data, in order to authenticate and process your request. Such additional information may be then retained by us for legal purposes (e.g., as proof of the identity of the person submitting the request), in accordance with Section 4 above. We may redact from the data which we will make available to you, any personal data related to others.

10. **ROLES AND RESPONSIBILITIES**

Certain data protection laws and regulations, such as the GDPR or the CCPA typically distinguish between two main roles for parties processing personal data: the “data controller” (or under the CCPA, “business”), who determines the purposes and means of processing; and the “data processor” (or under the CCPA, “service provider”), who processes the data on behalf of the data controller (or business). Below we explain how these roles apply to our Services, to the extent that such laws and regulations apply.

**Lightricks is the “Data Controller” of its Visitors’ and Apps Users’ data.** With respect to such data, we assume the responsibilities of data controller (solely to the extent applicable under law), as set forth in this Privacy Policy. In such instances, our Service Providers processing such data will assume the role of “data processor”.

**Lightricks is a “co-controller” of certain portions of its Users’ data,** alongside such Service Providers that process Personal Data for both Lightricks’ analytics and marketing purposes - and the Service Providers’ own purposes. In such cases, such Service Providers (e.g. Facebook and Google) will in such circumstances be deemed as “co-controllers” of such data, which would typically relate to Users who also use the Service Provider’s own platforms. If you wish to limit such independent activities by these Service Providers, consider disabling third-party cookies as detailed in Section 7 above.
11. **Additional Information and Contact Details**

**Updates and Amendments:** we may update and amend this Privacy Policy from time to time by posting an updated version on our Services. The amended version will be effective as of the date it is published. We will provide prior notice if we believe any substantial changes are involved via any of the communication means available to us or via Services. After such notice period, all amendments shall be deemed accepted by you.

**External Links:** while our Services may contain links to other websites or services, we are not responsible for their privacy practices. We encourage you to pay attention when you leave our Services for the website or application of such third-parties, and to read the privacy policies of each and every website and service you visit. This Privacy Policy applies only to our Services.

**Children:** The Services (both Web Services and Apps) are not intended for minors under the age of thirteen (13). IF YOU ARE UNDER THE AGE OF THIRTEEN (13) YOU MAY NOT USE THE SERVICES. If you are between thirteen (13) and eighteen (18) years old, you must review this Notice with your parent or guardian. If you have concerns about your child’s privacy, or if you believe that your child may have provided us with their personal data, please contact us at dpo@lightricks.com. We will take steps to delete the information as soon as possible should we learn that we have collected the personal data of a child under 13 without first receiving verifiable parental consent.

**EU Representative:** Lightricks has designated representatives in Germany for data protection matters. Inquiries regarding our EU privacy practices may be sent to dpo@lightricks.com or Lightricks GmbH, c/o Mazars Tax GmbH, Theodor Stern Kai 1, 60596 Frankfurt am Main, Germany.

**UK Representative:** Lightricks has designated representatives in the United Kingdom for data protection matters. Inquiries regarding our UK privacy practices may be sent to dpo@lightricks.com or Lightricks (UK), 37 Broadhurst Gardens, London, England, NW6 3QT United Kingdom.

**DPO:** Lightricks has appointed PrivacyTeam as its Data Protection Officer, for monitoring and advising on Lightricks’ ongoing privacy compliance and serving as a point of contact on privacy matters for data subjects and supervisory authorities. If you have any comments or questions regarding this Privacy Policy, if you have any concerns regarding your privacy, or if you wish to make a complaint about how your personal data is being processed by Lightricks, you can contact our DPO at dpo@lightricks.com.

**Questions, concerns or complaints:** if you have any comments or questions regarding our Privacy Policy, or if you have any concerns regarding your personal data held with us, or if you wish to make a complaint about how your personal data is being processed by Lightricks, you can contact us at dpo@lightricks.com.

Effective Date: January 2, 2022