

CCPA NOTICE

[Last Amended: March 19, 2024]

APPLICABILITY: Pursuant with the California Consumer Privacy Act of 2018 as amended and revised by the California Privacy Rights Act of 2020 (collectively “**CCPA**”), and any other California privacy laws, this CCPA Notice applies to Pixellot Ltd. including its affiliated companies' (collectively the “**Company**”) Prospects and Customers who are California residents (“**consumers**” or “**you**”). This CCPA Notice is an integral part of Company's [Privacy Policy](#), and thus, definitions used herein but not defined herein or under the CCPA shall have the same meaning as defined in the Privacy Policy.

This CCPA Notice applies to consumers Personal Information (as defined below), including employee and business-to-business Personal Information, if and to the extent applicable.

PART I: A COMPREHENSIVE DESCRIPTION OF THE INFORMATION PRACTICES:

(A) CATEGORIES OF PERSONAL INFORMATION THE COMPANY COLLECTS

The Company collect Personal Information which is defined under the CCPA as any information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household or device, all as detailed in the table below.

Personal Information further includes Sensitive Personal Information (“**SPI**”) as detailed in the table below.

Personal Information does not include: Publicly available information that is lawfully made available from government records, that a consumer has otherwise made available to the public; de-identified or aggregated consumer information; information excluded from the CCPA’s scope, such as: health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPPA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA) and the Driver’s Privacy Protection Act of 1994.

The Company has collected the following categories of personal information within the last twelve (12) months:

Category	Example	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	Yes: Online identifiers, Internet protocol address, unique identifiers, real name, email address, account name.

<p>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</p>	<p>A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p> <p>Some personal information included in this category may overlap with other categories.</p>	<p>Yes: a name, from the photos and videos we will be able to identify certain physical characteristics</p>
<p>C. Protected classification characteristics under California or federal law.</p>	<p>Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>	<p>No</p>
<p>D. Commercial information.</p>	<p>Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>No</p>
<p>E. Biometric information.</p>	<p>Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.</p>	<p>No</p>
<p>F. Internet or other similar network activity.</p>	<p>Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.</p>	<p>Yes: Prospects' interaction with online campaign we conduct and our Website, and customers' interaction with the Services and the Company's Properties.</p>

G. Geolocation data.	Physical location, approximate location derived from IP address or movements.	Yes: approximate location derived from IP address.
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	No
I. Professional or employment-related information.	Current or past job history or performance evaluations.	No
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Yes : from the photos and videos we will be able to infer gender, race or ethnicity characteristics and abilities.
L. Sensitive personal information.	Government-issued identifying numbers, financial account details, genetic data, precise geolocation, race or ethnicity, religious or philosophical beliefs, union membership, mail, email, text messages, biometric data, health data, and sexual orientation or sex life.	No

(B) CATEGORIES OF SOURCES OF PERSONAL INFORMATION

- Information you provide us directly – for example, when you register and create an account or correspond with us.
- Information we receive from third parties - for example, we receive Non-User Data directly from our customers.

- Information we receive automatically – we will collect your Usage Data including analytics data (or use third-party measurement and marketing tools) automatically as further detailed under section 5 to our Privacy Policy.

(C) USE OF PERSONAL INFORMATION

The Company may use the Personal Information collected as identified above, for the following purposes:

- To fulfill or meet the reason you provided the Personal Information (create your account, provide support, respond to a query, etc.);
- Provide the Services;
- Monitor and improve the Services;
- Respond to law enforcement; or otherwise as detailed in the Company’s [Privacy Policy](#).

The Company will not collect additional categories of Personal Information or use the Personal Information the Company collected for materially different, unrelated, or incompatible purposes without providing you notice.

(D) DISCLOSURES OF PERSONAL INFORMATION FOR A BUSINESS PURPOSE

The Company may disclose your Personal Information to a contractor or service provider for a Business Purpose. When the Company discloses Personal Information for a Business Purpose, the Company enters into a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except for performing the contract. The Company further restricts the contractor and service provider from selling or sharing your Personal Information.

In the preceding twelve (12) months, the Company has disclosed the following categories of Personal Information for a Business Purpose:

Business Purpose (as defined under CCPA)	Category (corresponding with the table above)	Category of Recipient
Helping to ensure security and integrity of Company's Properties to the extent the use of your Personal Information is reasonably necessary and proportionate for these purposes.	Category A Category B Category F Category G	Affiliates, operational partner, security and fraud prevention providers, operating systems.
Debugging to identify and repair errors that impair existing intended functionality.	Category A Category G	Analytic providers, operational partner, security and fraud prevention providers, operating systems.

<p>Performing services on behalf of the Company or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the Company or service provider</p>	<p>Category A Category B Category F Category G</p>	<p>Payment processors, subsidiaries, affiliated companies, operating systems, CRM, ERP, customer support, cloud computing and storage vendors, etc.</p>
<p>Undertaking internal research for technological development and demonstration.</p>	<p>Category A Category B Category F Category G Category K</p>	<p>Developers, operating systems, cloud and hosting providers, SaaS platforms for task management and development, customer support and optimization tools.</p>
<p>Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, or controlled by the Company, and to improve, upgrade, or enhance the service or device that is owned or controlled by the Company.</p>	<p>Category A Category B Category F Category G Category K</p>	<p>Developers, operating systems, cloud and hosting providers, SaaS platforms for task management and development, customer support and optimization tools.</p>
<p>Providing advertising and marketing services, except for cross-context behavioral advertising, to the consumer provided that, for the purpose of advertising and marketing, a service provider or contractor shall not combine the personal information of opted-out consumers that the service provider or contractor receives from, or on behalf of, the Company with personal information that the service provider or contractor receives from, or on behalf of, another person or persons or collects from its own interaction with consumers.</p>	<p>Category A Category F Category G</p>	<p>Advertising networks, data analytics providers, social media networks, marketing service providers and technical platforms such as CRM and tracking tools.</p>
<p>Advancing the Company's commercial or economic interests, such as by inducing another person to buy, rent, lease, join, subscribe to, provide, or exchange products, goods, property, information, or services, or enabling or effecting, directly or indirectly, a commercial transaction.</p>	<p>Category A Category F Category G</p>	<p>Affiliates, operating systems and platforms, advertising networks, data analytics providers, social media networks.</p>

(E) SALE OR SHARE OF PERSONAL INFORMATION

In the preceding twelve (12) months, the Company has not “sold” information as most people would normally understand that term and it will not disclose any Personal Information in direct exchange for money or some other form of payment.

For targeting and analytic purposes, when the Company promotes its Services, it uses third-party tools that are able to market the Services online, measure these marketing efforts, identify individuals that are interested in the Services, etc. This is done by placing cookies, SDKs, pixel or other tracking technology on the applicable Company's Properties and sharing with these vendors the online identifiers and online behavior information. Disclosing Personal Information with such third-party vendors for marketing and targeting purposes (which is often referred as "cross-contextual behavioral advertising") is defined as a "Share" under the CCPA, while under certain circumstances, disclosing Personal Information for analytic purposes might be considered as a "Sale". Therefore note, the Company may share your Personal Information with a third party to help promote the Services and understand your use it.

In the preceding twelve (12) months, the Company has “shared” the following categories of Personal Information for a Business Purpose:

Category (corresponding with the table above)	Category Recipient	Purpose of Sale or Share
Category A Category F Category G	Marketing tools and vendors.	Promoting the Services, etc.

(F) CHILDREN UNDER AGE 16

The Company's Properties and Services are not intended for use by children and the Company does not knowingly collect or maintain information about anyone under the age of 18. Please contact us at: privacy_pixellot@pixellot.tv if you have reason to believe that a child has shared any information with us.

(G) DATA RETENTION

In general, the Company retains the Personal Information it collects for as long as it remains necessary for the purposes set forth above, all under the applicable regulation, or until you express your preference to opt out, where applicable.

The retention periods are determined according to the criteria describe under Section 8 in the Company's [Privacy policy](#).

PART II: EXPLANATION OF YOUR RIGHTS UNDER THE CCPA AND HOW TO EXERCISE THEM

(H) YOUR RIGHTS UNDER THE CCPA

If you are a California resident, you may exercise certain privacy rights related to your Personal Information. You may exercise these rights free of charge except as otherwise permitted under applicable law, all as described herein and the Data Subject Request form ("**DSR**") available [here](#).

California Privacy Right	Details
The right to know what Personal Information the Company has collected.	The right to know what Personal Information the Company has collected about the consumer, including the categories of personal information, the categories of sources from which the Personal Information is collected, the Company or commercial purpose for collecting, selling, or sharing Personal Information, the categories of third parties to whom the Company discloses Personal Information, and the specific pieces of Personal Information the Company has collected about the consumer.
Deletion Rights.	The right to delete Personal Information that the Company has collected from the consumer, subject to certain exceptions.
Correct Inaccurate Information	The right to correct inaccurate Personal Information that the Company maintains about a consumer
Opt-Out of Sharing for Cross-Contextual Behavioral Advertising	The right to opt-out of the "sharing" of Personal Information for "cross-contextual behavioral advertising," often referred to as "interest-based advertising" or "targeted advertising."
Opt-out from selling	The right to opt-out of a "sale" of Personal Information by the Company.
Limit the Use or Disclosure of SPI	Under certain circumstances, if the Company uses or discloses SPI, the right to limit the use or disclosure of SPI by the Company.
Opt-Out of the Use of Automated Decision Making	In certain circumstances, you have the right to opt-out of the use of automated decision making in relation to your Personal Information.
Non-Discrimination	The right not to receive discriminatory treatment by the Company for the exercise of privacy rights conferred by the CCPA, including the right not to be retaliated, denying a consumer services, charging different prices or rates for services, providing you a different level or quality of services, etc. The Company may, however, charge different prices or rates, or provide a different level or quality of services, if that difference is reasonably related to the value provided to us by your Personal Information.
Data Portability	You may request to receive a copy of your Personal Information, including specific pieces of Personal Information, including, where

	applicable, to obtain a copy of the Personal Information you provided to us in a portable format.
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To learn more about your California privacy rights, please visit <https://oag.ca.gov/privacy/privacy-laws>.

(I) HOW CAN YOU EXERCISE THE RIGHTS?

You may exercise your rights through the DSR available [here](#). The instructions for submitting, the general description of the process, verification requirements, when applicable, including any information the consumer must provide are all detailed in the DSR.

(J) AUTHORIZED AGENTS

“Authorized agents” may submit opt out requests on a consumer’s behalf. If you have elected to use an authorized agent, or if you are an authorized agent who would like to submit requests on behalf of a consumer, the following procedures will be required prior to acceptance of any requests by an authorized agent on behalf of a California consumer. Usually, the Company will accept requests from qualified third parties on behalf of other consumers, regardless of either the consumer or the authorized agent’s state of residence, provided that the third party successfully completes the following qualification procedures:

- a. When a consumer uses an authorized agent to submit a request to know or a request to delete, the Company may require that the consumer do the following:
 - Provide the authorized agent signed permission to do so or power of attorney.
 - Verify their identity directly with the Company.
 - Directly confirm with the Company that they provided the authorized agent permission to submit the request.
- b. The Company may deny a request from an authorized agent that does not submit proof that they have been authorized by the consumer to act on their behalf.

(K) NOTICE OF FINANCIAL INCENTIVE

The Company does not offer financial incentives to consumers for providing Personal Information.

CONTACT US:

By email: privacy_pixellot@pixellot.tv

By mail: Granit 11 St. Petach-Tikva, Israel.

UPDATES:

This CCPA notice was last updated on March 19, 2024. As required under the CCPA, the Company will **update** the CCPA Notice **every 12 months**. The last revision date will be reflected in the “Last Amended” heading at the top of this CCPA Notice.

PART III: OTHER CALIFORNIA OBLIGATIONS

Do Not Track Settings: Cal. Bus. And Prof. Code Section 22575 also requires FlexCharge to notify its consumers how it deals with the “Do Not Track” settings in your browser. As of the effective date listed in this CCPA Notice heading, there is no commonly accepted response for Do Not Track signals initiated by browsers. Therefore, FlexCharge does not respond to the Do Not Track settings. Do Not Track is a privacy preference you can set in your web browser to indicate that you do not want certain information about your web page visits tracked and collected across websites. For more details, including how to turn on Do Not Track, visit: www.donottrack.us.

California’s “Shine the Light” Act (Civil Code Section § 1798.83): which permits California consumers to request certain information regarding the Company disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send us the DSR available [here](#).