

Privacy Policy

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Our company, ACHIEVED TECHNOLOGIES LTD (hereinafter: "The Company", "us", "we", "our" etc.), operates <http://www.achieved.io/> ("The Site").

This is the privacy policy ("Privacy Policy") that governs how we use and store Personal Information/Data (defined below) we collect and receive from and about the users of our site (Managers/Entrepreneurs and Investors/Customers).

This Privacy Notice may change from time to time. Your use of the Platform is subject to the changes, so you need to check back periodically for updates. In case of a material change we will make best efforts to provide a notification through The Site.

By accepting our Privacy Notice, you confirm that you read and understood our policies including how and why we use your information. If you do not want us to collect or process your Personal Information in ways described in our policy, you should not use the Platform. We are not responsible for the content or the privacy policies or practices of any of our users, members, third-party websites, or third-party apps.

Our services are not for use by any person under the age of 18.

Data Collection

Depending on your interaction with us (meaning, if you are an Entrepreneur/Manager or a Customer) we may collect two types of data from you:

1. **Non-Personal Data:** this data is non-identifiable information which may be made available or gathered through your use of The Site ("Non-Personal Data/Information") such as anonymized information.

2. **Personal Data:** The second type of information is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual ("Personal Data/Information"). To put it simply, Personal Data may identify you or is of a private or sensitive nature, such as your address or bank account information.

For the avoidance of doubt, Personal Data includes online identifiers and other information relating to an identified or identifiable person. Certain information may be considered Sensitive Data (for example, financial information, government identifiers, and other data defined as sensitive under applicable law) and will be handled with additional care.

In addition, if we may combine Personal Data with Non-Personal Data, the combined data will be treated as Personal Data for as long as it remains combined. We may also collect other personal information that you allow to be shared as part of your public profile on a third party – like a social network.

Examples of information we gather on Investors/Customers: Full name, ID (if the investment is done by a company then the company name and ID), Address, Phone number, Email, I.P. address, bank information: Account name, Account number, Branch, Bank name and number, IBAN number, Routing number, Swift Etc., Investment amount, KYC, agreements, contracts and other details provided by the Manager and related to the investor.

Like many site operators, we collect information that your browser sends whenever you visit our Site ("Log Data"). This Log Data may include information such as your computer's Internet Protocol ("IP") address, Clicks, usage, time spent on each screen, mouse location, keyboard typing, details of your browser and operating system, the website from which you visit our website, the pages that you browse on our website, the date of your visit Etc.

Some of this information is collected using cookies – please see Cookies Section for further information.

We may also collect other personal information that you allow to be shared as part of your public profile on a third-party social network.

In addition, we may use third party services such as Google Analytics, tag manager and other, that collect, monitor and analyze information and you agree to this use when browsing the site.

Entrepreneur/Manager may provide Personal Information about Investors/Customers (and vice-versa) and other third parties. You can only provide us Information that belongs to you or that you have the permission to provide. You must get the consent of any third party to provide the information. We will not be responsible for any damage to third parties caused by you. By using the site, you agree to hold us harmless from any claims and/or damages that may arise from actions of any third party.

Cookies

We may collect information using cookies, web beacons and similar technologies ("cookies") which are files with small amount of data that the Website saves on your computer or mobile device.

We use "session cookies" and "persistent cookies." Session Cookies are temporary Cookies that remain on your device until you leave the Website. A persistent Cookie may remain on your device for a period or until you delete it.

Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse some or all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Site.

Here are some examples that explain how we may use cookies: To store information on user's preferences (such as languages and currencies); When Using external APIs (Such as google maps); To store security tokens information (such as token expiration) etc.

You can always control or delete cookies from your computer. A good place to start is: <https://www.aboutcookies.org/> and <https://policies.google.com/technologies/managing>.

Some third party sites may use cookies when you use our site (Like Google) we have no responsibility for these cookies and you can manage them at your discretion. You can visit <https://policies.google.com/technologies/types> for more information.

Use of Data

We may use your Personal Information as required or permitted by any applicable law. We use the collected data for various purposes:

- Provide and operate our services.
- Create your Account and help you efficiently access your information.
- Provide transparent information of projects and investment processes.
- Allow and improve communication and resource allocation between investors and managers.
- Suggest additional services such as credit and matching between parties.
- Allow and develop a secondary market for investors and managers.
- Improve user experience.
- Provide customer support, respond to your inquiries or requests and contact and communicate with you.
- Improve our services and develop new products or services.
- Monitor the usage of our website and services.
- Detecting, preventing and addressing technical issues.
- Secure our site, information and services and prevent fraud.
- Contact you with general or personalized service-related notices, promotional messages and news and information about new services and events which we offer (subject to your consent as may be required under applicable law).
- Any other purpose with your consent.

Legal Basis for Processing

We process Personal Data only where we have a lawful basis to do so, including: (a) where processing is necessary to perform a contract with you or to provide the Services; (b) where processing is necessary to comply with a legal obligation; (c) where processing is necessary for our legitimate interests (such as securing the Platform, preventing fraud, and improving our Services), provided such interests are not overridden by your rights; and/or (d) where you have provided your consent, which you may withdraw at any time.

Data Minimization

We collect and process Personal Data that is reasonably necessary for the purposes described in this Privacy Policy and we take steps to avoid collecting excessive or irrelevant data.

Data Retention

We retain Personal Data only for as long as necessary to fulfill the purposes for which it was collected, including to provide the Services, comply with legal and regulatory requirements, resolve

disputes, and enforce agreements. When Personal Data is no longer required, we will delete it, anonymize it, or securely archive it in accordance with applicable law.

Data Security Incidents

In the event of a data security incident that may affect Personal Data, we will investigate, mitigate harm, and act in accordance with applicable law, including notifying relevant authorities and/or affected individuals when required.

Your rights

You may have the right to request a review of your Personal Data held by us and obtain a copy. If the Personal Data Processed by us is incorrect, incomplete, unclear or outdated, you may have the right to demand it to be modified. Under certain conditions, you may be entitled to require to delete your Personal Data. Under certain conditions, you may have the right to transfer the Personal Data that you have provided us to another entity. 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. To make any request, please email us. Please be noticed that you have the right to lodge a complaint before the relevant authority or supervisory authority of Your jurisdiction.

Information Sharing

We do not sell, rent or lease Personal Data. We may share Personal Data with service providers and other third parties, if necessary to fulfil the purposes for collecting the information, such as cloud vendors, subcontractors providing us processing services, etc., provided that any such third party will commit to protect privacy as required under applicable law or best practice.

Additionally, a merger, acquisition or any other structural change may require us to transfer Personal Data to another entity, provided that the receiving entity will comply with this Policy.

We may need to disclose Personal Data in response to lawful requests by public authorities or law enforcement officials, including for meeting national security or law enforcement requirements. We may share your information when we believe it is necessary to comply with applicable laws, to protect our interests or property, to prevent fraud or other illegal activity or to protect the safety of any person. This may include sharing information with other companies, lawyers, agents, or government agencies.

Communications

We may use your Personal Information to contact you with newsletters, marketing or promotional materials and other information, subject to your consent. You may opt-out at any time in accordance with applicable law.

Security

The security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. We make efforts to follow generally accepted industry standards to protect the Personal Information submitted to us, both during transmission and once we receive it. While we use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

In general, we store our data (including Personal Information) on cloud servers of third party suppliers such as, but not limited to, Amazon cloud (AWS). By registering for and using the Services you consent to the transfer of information to this third party suppliers. If you are located in a jurisdiction where transfer of Personal Information to another jurisdiction requires consent, then you provide us express consent to such transfer by using the Website and/or Services. The data will be stored on databases that comply with Applicable Laws.

Our Security mechanisms include:

- Securing all information on AWS servers.
- All connections are SSL secured.
- Encryption of sensitive database data.
- Encryption and restriction of employee access to databases and servers.
- Regular basis backup of our environment.
- Support of 2FA for additional user security.
- Support of email verification for enhanced process.

Databases and Compliance

The Company maintains databases that may contain Personal Data and manages them in accordance with the Israeli Privacy Protection Law, its amendments (including Amendment 13), and applicable regulations. Where required, the Company will complete any registrations, notifications, or reporting obligations to the Israeli Privacy Protection Authority.

Users from outside of Israel

We are incorporated in Israel. Please be aware that your information may be subject to Israeli law. The privacy and data protection laws in Israel may not be equivalent to such laws in your country of residence. By using our services or by providing information, you agree to be subject to Israeli law.

This Privacy Policy shall be solely governed by and construed in accordance with the laws of the State of Israel.

The courts of Central ("Merkaz") district shall have exclusive jurisdiction in all disputes and proceedings arising from this Privacy Policy.

Authentication via external identity providers

We allow users to sign in to the Platform using external identity providers (for example, Google, Microsoft, Apple). When you sign in using an identity provider, the provider may share certain Personal Data with Achieved (for example: name, email address, profile picture, and a unique identifier). The exact data shared depends on the permissions (scopes) you grant to the provider.

We request only the minimum information necessary to authenticate you and create or link your Achieved account.

How we use this data. We process data received from an identity provider for authentication and account management and otherwise as described in this Privacy Policy (e.g., to contact you, to secure your account, or as necessary to provide the Services).

Legal basis. Where applicable, our legal basis for processing identity data is consent.

Retention. We retain identity data only as long as necessary to provide the Services, unless otherwise required by law. If you revoke permissions with the identity provider or delete your account we will delete or anonymize identity attributes in accordance with this Policy.

Third-party processing. The identity provider's processing of your Personal Data is governed by the provider's terms and privacy policy, and Achieved is not responsible for those practices. We recommend reviewing the identity provider's privacy policy before granting permissions. Links to common providers' privacy policies: [Google], [Microsoft], [Apple].

Security and scopes. We limit the scopes requested from identity providers to the minimum necessary for function. You may also sign up using a Achieved username/password where available.

Data Protection Officer

Where required under applicable law, the Company appoints a person responsible for overseeing privacy compliance and serving as a point of contact for privacy-related inquiries. You may contact us using the details in the Contact Us section below.

Contact Us

If you have any questions about this Privacy Policy, please contact us at: nir.sam@achieved.io.