

# LIGHTRICKS PRIVACY POLICY

Last Modified: November 11, 2024

Lightricks Ltd., including our subsidiaries and affiliated companies (collectively, “Lightricks”, “we”, “our” or “us”), puts great efforts in making sure that the personal data we process is stored securely and used properly, and that our data processing practices are accurately communicated to our users and prospective users.

Lightricks is a pioneer in innovative technology that bridges the gap between imagination and creation. Lightricks’ photo and video editing tools offer endless possibilities and inspiration, providing individuals, content creators, or influencers the ability to monetize their work and offer brands opportunities to scale their content through tailored creator partnerships. Lightricks is a global company, offering these services, apps and technology worldwide.

This privacy policy (“Policy” or “Privacy Policy”) describes how we collect, store, use and disclose information while using any of our services, technologies and apps detailed herein. We tried to detail these processes in a simple and friendly manner, however, as Lightricks offers various mobile and web services (each an “App”), features and feeds (“Lightricks Feed”), an online marketplace (“Popular Pays Marketplace”) connecting brands and agencies (“Brand(s)”) and individuals, content creators and influencers (“Creator(s)”) and tools and services to be used for Brands in connection with their digital campaigns’ operation (“Campaign Tools”) (collectively “Services”), all of which process your data differently, we encourage you to read carefully and reach out to us if you have any further questions.

This Policy is applicable to (collectively and separately, referred to as “you” or “your”): (i) prospects and visitors browsing our websites, landing pages, engaging with ads and campaigns promoting our services, blogs or other web-forms and digital assets (“Prospect” and “Visitor”, respectively); (ii) users accessing, installing or otherwise using our Apps (“Users”); (iii) Brands and Creators using the Popular Pays Marketplace or Campaign Tools; and (iv) any individuals using our Services.

You are not obligated, at any time, to provide us with Personal Data or Personal Information (as defined below).

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## **1. UPDATES AND AMENDMENTS**

We may update and amend this Policy from time to time, at our sole discretion. The most recent version of the Policy will always be accessible from our website or Apps. The updated date of the Policy will be reflected in the “Last Modified” heading. In case of a material change, or if required by law, we will provide notice reflecting these changes. Any amendments to our privacy practices described under this Policy will become effective within 30 days after we publish the modified Policy, other than any privacy practices related to new released features which will become effective as of the date of such release. We recommend you review this Policy periodically to ensure that you understand our most updated privacy practices.

## **2. CONTACT INFORMATION AND ROLES**

Lightricks Ltd. is incorporated under the laws of the state of Israel and, unless otherwise explicitly mentioned in the table below, is the **Controller** of the Personal Data (as such terms are defined under the General Data Protection Regulations “GDPR” or equivalent privacy legislation).

For any questions, inquiries or concerns related to this Privacy Policy or the processing of your Personal Data, you may contact us as follows:

### **Data Protection Officer - Contact Information:**

**By Email:** [dpo@lightricks.com](mailto:dpo@lightricks.com)

**By Mail:**

Lightricks Ltd.

Professor Racah St, Building 5.4, Jerusalem, Israel, 9190401

Attn: Data Protection Officer

### **Data Protection Representative - For Data Subjects in the EU and UK - Contact Information:**

We have appointed Data Protection Representatives (“DPR”) in Germany and in the UK for data protection matters concerning EU or UK data subjects.

- **EU DPR Contact Information:**

Inquiries regarding our EU privacy practices may be sent to our EU DPR as follow:

**By Email:** [dpr@lightricks.com](mailto:dpr@lightricks.com)

**By Mail:**

Lightricks GmbH,

c/o Mazars Tax GmbH, Theodor Stern Kai 1, 60596 Frankfurt am Main, Germany.

Attn: EU Data Protection Representative

● **UK DPR Contact Information:**

Inquiries regarding our UK privacy practices may be sent to our UK DPR as follow:

**By Email:** [uk-dpr@lightricks.com](mailto:uk-dpr@lightricks.com)

**By Mail:**

Lightricks (UK) Ltd (ICO Registration number: ZB253341),

37 Broadhurst Gardens, London, England, NW6 3QT United Kingdom.

Attn: UK Data Protection Representative

**3. TYPE OF DATA SETS PROCESSED**

During your use or interaction with the Services, we collect aggregated, non-personal, non-identifiable information (“**Non-Personal Data**”). Non-Personal Data collected includes aggregated usage information, anonymized information, and technical information, such as: type of browser or device, language preference, time and date stamp, etc.

We further collect information that identifies an individual or may, with reasonable effort, be used to identify an individual (“**Personal Data**”). The types of Personal Data that we collect as well as the purpose for processing such data are specified in the tables below. For the avoidance of doubt, any Non-Personal Data connected or linked to any Personal Data shall be deemed Personal Data as long as such connection or linkage exists.

We may process demographic data and certain profiling criteria, which is either provided by you or otherwise inferred from the data sets listed below, by means of example, from your pictures we may determine your gender and age, as further explained below.

**4. PURPOSE, LAWFUL BASIS, AND PROCESSING OPERATIONS**

We have detailed below, for each type of Service, the Personal Data processed, the purpose and operation and the lawful basis for such processing. There are four tables below, [Table A](#) details the **Personal Data processed while using our Apps**, including through our website or tools and features accessible through third party platforms, by using our bots, tags, etc. (“**Third Party Platforms**”), [Table B](#) details the Personal Data used for **development, AI machine learning**, or otherwise used for internal purposes, [Table C](#) details the Personal Data processed when using **Popular Pays Marketplace or Campaign Tools** and [Table D](#) details the Personal Data processed when you interact with our **website(s)**, ads, or other digital assets.

**TABLE A: APPS, AI & EDITING TOOLS AND TECHNOLOGIES**

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS
<p><b><u>Registration, Account Data &amp; Information:</u></b></p> <p>After you install the App or upon accessing web Apps, you will log in and create your account (for iOS</p>	<p>We use the Registration Data to create an account, and for authentication and identification purposes. If you use several Apps and you have</p>	<p>Registration Data and Account Data are processed for the purpose of performing our contract with you, meaning, to designate your account and</p>

<p>users, creating an account is optional).</p> <p>You may choose to login using your Apple, Facebook or Google account or otherwise by entering your email address.</p> <p>If you login through Facebook, Google or Apple, we will receive information connected to such account (depending on the privacy settings you chose) such as your name, profile picture, friends list, demographic data and location (collectively "<b>Registration Data</b>").</p> <p>For certain Apps, you may further voluntarily choose to add or provide certain information about you under your account or bio page, such as certain preferences, characteristics, demographic data, etc. In addition, for certain Apps and Services, you may choose to upload photos to label and associate with each profile you create and wish to include under your account (i.e., a thumbnail image).</p> <p>(collectively "<b>Account Data</b>")</p>	<p>signed in, we will be able to identify you across those various Apps and share the information processed in each of the Apps.</p> <p>We will use your email address to send you operational messages such as invoices and services related messages.</p> <p>We may further send you other materials and content, including marketing materials ("<b>Direct Marketing</b>").</p> <p>Additional Personal Data you voluntarily provide as part of the Account Data will be used to provide the Services for which such information was provided, as well as for Services improvement, development, and customization, as further detailed under this Privacy Policy.</p>	<p>provide with requested Services.</p> <p>Processing for Direct Marketing is subject to our legitimate interest, you may opt-out at any time by unsubscribing. Note, even if you unsubscribe operational and service-related messages will still be sent.</p>
<p><b><u>Online Identifiers and Usage Data:</u></b></p> <p>When you use the Apps (including tools and features made available through our website or Third-Party Platforms), we, or our third-party partners, identify you through Online Identifiers. "<b>Online Identifiers</b>" are unique identifiers associated with your account, device or browser, which are either designated by us or transmitted from your device, and may include identifiers known as "IDFA" or "AAID", IP address, cookie ID, agent, etc.</p> <p>We further process, directly or indirectly through our third-party</p>	<p>Online Identifiers and Usage Data are used for analytics and operational purposes, correcting errors and bugs, adjust language preference, if applicable, to enable you to use the Services and to provide you with its functionalities.</p> <p>Some of the Apps further display interest-based ads or other marketing and promotions which are based on the Usage Data.</p> <p>We may further use the Usage Data to customize our Services and offer you and our users' content or other Services based on Usage Data or statistics and</p>	<p>When the processing is for marketing or tracking purposes, we will obtain your consent to process Personal Data (where required under applicable laws).</p> <p>When the processing of Personal Data is for operations and providing the Services' functionalities, the lawful basis is contract necessity.</p> <p>Last, the Personal Data may be processed subject to our legitimate interest of understanding how our Services are used, correcting errors and enhancing experience, including by</p>

<p>partners and service providers, usage data, which may or may not be associated with the Online Identifiers or your account. When associated with an Online Identifier or your account it will be treated as Personal Data, otherwise, if the usage data is aggregated, anonymized or de-identified, it will not be considered as Personal Data.</p> <p>The usage data includes information regarding your interaction with the App and Services, features used, time stamp and duration of use, click stream data, errors that occurred, as well as your interaction with the content or ads displayed, records of advertising and content displayed on pages or App screens displayed to you, and any interaction you may have had with such content or advertising (collectively “Usage Data”).</p>	<p>our analyze of Usage Data, meaning that we can assume you will be interested in based on other features you have used, etc.</p>	<p>personalizing our offers, content and promotions.</p>
<p><b><u>Editing Tools – Images, Photos and Videos:</u></b></p> <p>To enable the Services, you will either provide us access to your photo gallery or import photos or videos from your gallery.</p> <p>Images, photos and videos are processed <b>on your device</b> for the purpose of determining the estimated location of parts of faces (such as the eyes, nose or mouth) and points on the face and eyes, which are applied to a generic model of a face that is used to help you edit images and videos in real time (“<b>Face Data</b>”).</p> <p>Face Data is processed on your device. We do not collect or store Face Data on our servers or share it with third parties.</p> <p>If you choose to store projects that use Face Data, the data will</p>	<p>We process the data to enable the use of the editing tools and features available within the Services (Apps and other editing tools), including the ability to edit your images, videos and media, and to further improve the results of the created artwork.</p> <p>When photos, videos, images or audio recordings are used for creating artwork or adding effects to your creations, the selected content is uploaded to the Lightricks Cloud. The photos, videos and images you upload are stored for up to 30 days, except where you have: (i) provided us with consent to further retain the content you have uploaded for development and AI machine learning purposes (as detailed under <a href="#">Table B</a> below), or; (ii) uploaded</p>	<p>We process the images, video photos, audio recording, Face Data, demographic, and characteristics related data (inferred or provided by you as part of your Account Data), for the purpose of providing the Services and performing our contract with you.</p> <p>If you granted access to your photo gallery, you can revoke the permission at any time.</p> <p>We will further process demographic or otherwise any characteristics related data (inferred or provided by you), as well as data related to the features or effects used, subject to our legitimate interest, to improve, enhance and customize our offers and Services.</p>

<p>be stored on your device until you delete the project, the project is deleted automatically due to storage limits, or you delete the App. Depending on the App and Service you use, we also process demographic data, such as age (or age group) and gender and other characteristics such as skin tone, which are either inferred from your images, photos and videos or otherwise provided by you (as part of your Account Data), as well as additional information you voluntarily choose to provide us.</p>	<p>such content through the use of our “LTX Studio” Services of film production, where in such event we need to retain such content for as long as your created artwork is retained (i.e., the output, as further explained below), in order to maintain the sequence of images you chose to integrate and include in such output .</p> <p>Your output image or other created artwork will be stored on our Lightricks Cloud until you request us to delete your Personal Data and your account, in order to make such output image accessible to you, provided that we may earlier delete such outputs according to our internal retention policies.</p> <p>We will further process demographic data, and other characteristics (inferred or provided by you as part of your Account Data), as well as the features or effects you use through our Services in order to: (i) market personalized offers by Lightricks, and for example, to offer you features which are similar to the features you use or popular among users with similar characteristics. We do not use Face Data for marketing purposes and this information is not shared with any third parties; and (ii) AI machine learning and internal development (as further described in <a href="#">Table B</a>, below).</p>	
<p><b><u>AI Tools and Features:</u></b></p> <p>Certain Services accessible through the Apps, our website or Third-Party Platforms include artificial intelligence (“AI”) technology for creating and</p>	<p>We process the data, including Inputs, Voice Models, Face Models, metadata, and other information you voluntarily choose to provide, for the purpose of providing the</p>	<p>We process the Inputs, metadata, or other information you voluntarily choose to provide, to generate the Voice Models, Face Models, and create the AI</p>

<p>editing images, photos, videos, and audio files. This AI technology allows you to use various features, including, among others, personalized magical avatars (“<b>Avatars</b>”), motions and effects, art styles, text to image, and synthetic voice speech, “swap” features or other face or voice manipulation features (for example to “swap” voices or face images), film production (as part of our LTX Studio Services) (collectively “<b>AI Tools Outputs</b>”).</p> <p>To create the AI Tools Outputs, as well as to generate the Face Model and Voice Model (as defined below), and as applicable, we process, including by our AI technology, the original images, videos, or audio recordings that you upload (“<b>Inputs</b>”), as well as demographic data (such as gender and skin tone) provided by you under your Account Data.</p> <p>To create the AI Tools Outputs, including to improve and optimize the results, our AI technology further generates and processes types of information known as “metadata”, meaning, information extracted from your Inputs and describing certain elements of such Inputs such as estimated demographic data (for example age or age group, gender and skin tone of the character or voice in the Input), and other labels or tags of items in such Inputs, as well as uses face detection to analyze Inputs (images and videos) in order to estimate the posture and location of faces or of parts and areas of faces and other non-identifying characteristics of faces that appear in frame.</p>	<p>Services and generating the AI Tools Outputs.</p> <p>Note that, this data might be processed on your device or otherwise uploaded and processed on the Lightricks Cloud – depending on the specific App, feature, or Service you use.</p> <p>Specifically, to create the Avatars, we process 10-25 images as Inputs, and we are currently using the neural network model Stable Diffusion that allows Users to generate personalized Avatars.</p> <p>Inputs are usually retained for a short-term period of up to 30 days after the AI Tools Outputs were generated, except where you have: (i) provided us with consent to further retain it for development and AI machine learning purposes (as detailed under <a href="#">Table B</a> below), or; (ii) uploaded such Inputs through the use of our “LTX Studio” Services of film production, where in such event we need to retain such Input for as long as your AI Tools Outputs are retained (as further explained below), in order to maintain the sequence of Inputs you chose to integrate and include in such AI Tools Outputs.</p> <p>In the event that AI Tools Outputs are processed and stored on the Lightricks Cloud, such will be retained to remain accessible for you through the App at any time and from any device until you decide to delete them by requesting us to delete all your information and your account, provided that we may earlier delete such AI Tools</p>	<p>Tools Outputs and optimize their results, meaning, for the purpose of providing the Services and performing our contract with you.</p> <p>Where required under applicable laws, we will obtain your consent for the processing of such data sets.</p> <p>We will further process demographic information, the gathered metadata or otherwise any characteristics related data, as well as data related to the features or effects used, subject to our legitimate interest to improve, enhance and customize our offers and Services, and for example, to offer you features which are similar to the features you use or popular among users with similar characteristics.</p>
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<p>We may further process Non-User Personal Data (as defined and described in the section below), including for the purpose of generating Voice Models and Face Models (defined below) in the event your Inputs include any third party’s image or voice.</p> <p>- <u>Voice Models:</u></p> <p>To provide certain voice AI Tools Outputs, our AI technology uses voice recordings that you upload, and the extracted “metadata” described above to create a voice sample and generate a model of the voice that appears in your recording Input (“<b>Voice Model</b>”). Voice Models are not used to identify you or anyone else. However, Voice Models may be deemed “biometric identifier” according to the laws of your jurisdiction, and will only be processed with your consent, subject to the terms of such laws and this Policy.</p> <p>- <u>Face Models:</u></p> <p>To provide certain visual AI Tools Outputs, our AI technology uses images and video Inputs, as well as the “metadata” described above that may further generate facial features information such as facial geometry, topology, and face embedding, in order to create a model of the face that appears in your Input (“<b>Face Model</b>”). Face Models are not used to identify you or anyone else. However, Face Models may be deemed “biometric identifiers” according to the laws of your jurisdiction, and will only be processed with your consent,</p>	<p>Outputs according to our internal retention policies.</p> <p>In the event that the Voice Models or Face Models created from your Inputs are processed and stored on the Lightricks Cloud, they will be stored to enable repeat experiences using them. Voice Models and Face Models will be permanently deleted within 3 years after the last time you have used them, or earlier if you ask us to delete all your information and your account or otherwise according to our retention policies.</p> <p>Voice Models and Face Models, if retained and stored by us, are retained and used solely to provide you with additional AI Tools Outputs you request to generate through your use of the App and Services, unless you have otherwise provided us with consent to use Face Models and Voice Models for development and AI machine learning purposes (as detailed under <a href="#">Table B</a> below) .</p> <p>We do not share Face Models or Voice Models with third parties except in the limited circumstances described under this Policy (see Section 7 – <i>Data Sharing</i>, below).</p> <p>Inputs, the gathered metadata, and AI Tools Outputs, will be further used for AI machine learning and internal development (as further described in <a href="#">Table B</a>, below).</p> <p>We will further process the inferred demographic data, tags, labels or otherwise any</p>	
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<p>subject to the terms of such laws and this Policy.</p> <p>- <u>Use of AI Tools through Third Party Platforms:</u></p> <p>Our AI technology may be further accessible through Third Party Platforms, which enable you to generate and receive the AI Tools Outputs within such Third-Party Platforms. Please note that, any information that you upload to, or obtain through, Third Party Platforms (even if using our pages and bots), shall be further subject to such Third-Party Platforms' terms and policies that apply to you as their user and we do not have control nor responsibility in this regard.</p> <p>- <u>AI Tools – Chatbots:</u></p> <p>Our Services may include interaction with chatbot, to be provided with AI Tools Output of feedback and recommendations regarding Inputs you upload (for example feedback related to certain characteristics of the images, etc.). These chatbots may be powered by third party service providers AI tools to process your Personal Data and provide the AI Tools Output (as further explained under our <a href="#">Terms of Use</a>). The use of chatbot features will include processing of your Input (meaning the image you upload), and the AI Tools Output which may include certain inferred demographic information or other characteristics such as gender, skin tone, hair, and eye colors, etc.</p>	<p>characteristics related data, as well as data related to the features or effects used, to improve, enhance and customize our offers and Services.</p> <p>Note that, within the parameters set forth above, we may retain, store, or delete Inputs and AI Tools Outputs at our discretion and the above shall not be considered as any obligation on behalf of Lightricks to store or retain any information.</p>	
<p><b><u>Non-User Personal Data:</u></b></p> <p>You may only provide Inputs that include Personal Data of others (“<b>Non-Users</b>”) if you are authorized to consent and have consented (or otherwise</p>	<p>We process the Input you upload (i.e., photo, video or audio recording) for the purpose of providing the Services and the additional purposes described under this Privacy Policy.</p>	<p>Non-User data is processed based on our legitimate interest in providing the Services to our User.</p>

<p>acknowledge or approve, as required under applicable laws) to the terms of this Privacy Policy on their behalf.</p> <p>For certain Services, where we are able to determine that you have shared Non-User Personal Data with us, such as the images or videos that you submit in connection with our “couples’ avatars” feature, we will use the images or videos to generate the Avatar, or other Output and delete the Inputs permanently from the Lightricks Cloud.</p> <p>In addition, you may invite friends to use our Apps. By doing that you will be requested to share the contact details of your friend(s) (such as email address or phone number).</p>	<p>We will process your friend contact details only for the purpose of sending them an invite to use the Services, we will not use this data for any other purpose.</p>	
<p><b><u>Support:</u></b></p> <p>When you contact us for customer support, we will process your contact information, as well as any information you choose to provide as part as our communications and correspondence.</p>	<p>We will use the contact information to provide the customer support and communicate with you. We will retain such communications to have records of the support that was provided, for any future needs as well as to further improve our Services and support.</p>	<p>We process such information, for the purpose of providing the support services and performing our contract with you.</p> <p>We will further retain our communications for records keeping and services improvement, including to train our customer support team, based on our legitimate interest.</p>
<p><b><u>Survey and Feedback:</u></b></p> <p>We may ask you to provide feedback on our Services through various means of communications such as through our App, Direct Marketing (as defined above), or otherwise through third party survey platforms. If you choose to address our request for such feedback or participate in our survey, we will collect your feedback (as provided, i.e., in writing or otherwise any call recording) and may collect, as</p>	<p>We use this information to improve, revise and enhance our Service, as well as optimize and customize the Services.</p>	<p>We process such information subject to your consent. You may withdraw your consent at any time by contacting us through the contact information provided herein.</p>

<p>applicable, additional information related to the feedback provided such as the Input, Output or feature of our App used which is the subject matter of the feedback, contact information such as your name, email address, etc.</p>		
<p><b><u>Purchase Details:</u></b></p> <p>Certain features and Services are subject to payment, either in-app or subscription payments. Payments are made through in app purchase (“IAP”), in which Google Play or Apple Store terms would govern such payments, or by third party payment processing services (such as <a href="#">Adyen</a> and <a href="#">PayPal</a>) and we do not collect store, or have access to your full payment details; however, we process the commercial transaction data such as, records of purchases and prices; shipping details (if applicable); address, contact telephone number and email address (“<b>Transactions Data</b>”).</p>	<p>We use Transactions Data to process your payments and provide the applicable Service you have purchased.</p> <p>Any information related to your payment means and transactions is processed by the third parties' platforms or IAP and will be governed by such third parties' own privacy policy and terms, which we recommend that your review.</p>	<p>We process Transactions Data to provide the Services and perform our contract with you.</p> <p>We may further use such information to analyze our Services and their performance (e.g., features' popularity), as well as to customize and improve our offers and Services, based on our legitimate interests.</p>
<p><b><u>Social Media:</u></b></p> <p>When you use the Lightricks Feed, or share your creations on social media, we will process Personal Data which you make available, such as profile photos, name, email address, social media accounts, reactions to feed posts and your searches made withing the Lightricks Feed (“<b>Feed Data</b>”).</p>	<p>We use the Feed Data to provide you with the Lightricks Feed Services and to enable your interaction with third party social media. We further process your searches for internal analytics and Service improvement purposes, as well as to customize our offers and content.</p>	<p>We process Feed Data to enable and provide such service, for the performance of our contract with you.</p> <p>Feed Data is further processed for internal analytics and Service improvement purposes based on our legitimate interests.</p> <p>Note, information you choose to make public, may not be able to be deleted even if you delete the App and your account.</p>
<p><b><u>Permissions:</u></b></p> <p>Depending on the App used or the features you wish to enjoy, you will be asked to grant us access permissions such as: access to</p>	<p>We will use these permissions to process the information needed to provide the Service or enhance the Service.</p>	<p>To access these App Permissions, you will need to actively and explicitly enable them through an in-app permission or the mobile</p>

<p>photo gallery, microphone or audio files, enable tracking tools, push notification, access to your social accounts, etc. (“<b>App Permissions</b>”).</p>		<p>settings. You can disable the App Permissions at any time, however note, depending on the App Permission if you disable App Permission, certain feature or all features might not properly operate.</p>
<p><b>Use of Third-Party Technologies:</b></p> <p>Our Apps may include integration with third-party analytics service providers such as Google Analytics, Google’s Crashlytics and Firebase services, and Facebook. We may disclose your information (such as Online Identifiers and Usage Data) to these analytics providers to help us learn more about how you and others use our Services. For more information on the SDKs integrated on our Apps, please see below:</p> <p><a href="#">AppsFlyer SDK</a>; <a href="#">Nimble SDK</a>; <a href="#">AppLovin SDK</a>; <a href="#">Facebook iOS SDK</a>; <a href="#">Firebase iOS SDK</a>; <a href="#">Google signing iOS SDK</a>; <a href="#">Survey-Monkey iOS SDK</a>; <a href="#">TikTok SDK</a>; <a href="#">Braze SDK</a>; <a href="#">Full Story SDK</a>; <a href="#">Pendo.io</a>; <a href="#">Snapchat SDK</a>; <a href="#">Optimizely SDK</a></p>	<p>We will disclose the information to third party analytic providers for marketing and tracking purposes, analytics and operational purposes, correcting errors and bugs, enhance the Services such as to adjust language preference, if applicable, to enable you to use the App and to provide you with its functionalities.</p>	<p>When the processing is for marketing or tracking, where required under applicable laws we will process the Personal Data based on consent. Otherwise, we will process and share the Personal Data subject to our legitimate interest.</p>

**TABLE B: AI MACHINE LEARNING AND INTERNAL DEVELOPMENT**

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS
<ol style="list-style-type: none"> <li>1) Usage Data;</li> <li>2) Inputs, including the posture, location and other non-identifying characteristics of faces detected in Inputs by our AI technology (but not including Face Data, defined above);</li> <li>3) Outputs (including AI Tools Outputs);</li> <li>4) Inferred demographic data and metadata such as</li> </ol>	<p>We will use the Usage Data and inferred data, labels, tags, and other metadata to enrich the content and improve the features available within the Services as well as) to personalize the Service offered to you, tailor offers to your interest and offering additional Lightricks products, apps or services which we believe you will enjoy, based on your use.</p>	<p>The Usage Data and inferred data, labels, tags, and other metadata as well as Inputs and Outputs used for services improvement, personalization and ML Purposes are processed subject to our legitimate interest to improve our Services and technology.</p> <p>The Face Models and Voice Models processed for service development and improvement, including ML</p>

<p>estimated gender or age group and skin tone.</p> <p>5) Face Models and Voice Models</p> <p>Note that, all capitalized terms listed herein are defined under <a href="#">Table A</a> above.</p>	<p>To improve the AI technology and to offer better Services, we use parts of your Inputs and Outputs for AI machine learning purposes, meaning to train our AI algorithm, develop and create models (such as <a href="#">diffusion models</a>, GAN, and others) and features, as well as to improve our Services (“<b>ML Purposes</b>”).</p> <p>Subject to your consent, we may further use Face Models and Voice Models for ML Purposes, and may retain Inputs for longer periods than as set forth under <a href="#">Table A</a> above for our ML Purposes.</p> <p>The Inputs, Outputs, Face Models and Voice Models we use for such purposes will not be used to identify you or any other individual, and we will remove any identifying information related to you or your account.</p> <p>In addition, we automatically label certain images detected in your Input such as “dog”, “cat”, and male, female, estimated age group and skin tone to improve the performance of the AI technology and features and the outputs (including AI Tools Outputs), such as text-to-image, Avatar creation and edited images for purposes of labeling data for use in machine learning and improve and develop the features and Services. Note that labeled data is not tied to any identified individual.</p>	<p>Purposes, as well as extending our retention of Inputs for such purposes, are subject to obtaining your consent. You have the right to withdraw your consent at any time, as set forth under the “<i>User Rights</i>” section below or through the app settings.</p> <p>We ensure that identifying information, such as Online Identifiers, email address, etc. is not associated with the information used for ML Purposes.</p> <p>Except as detailed above, Face Models and Voice Models used for training and learning will be permanently deleted within 3 years after it is created.</p>
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Please note that we do our best to moderate the setting of the AI Tools Output to not include any inappropriate or harmful content, however, it is your sole responsibility to upload images, videos, audio and other content that is not unlawful, libelous, defamatory, obscene, pornographic, indecent, lewd, suggestive, harassing, threatening, invasive of privacy or publicity rights, abusive, inflammatory, fraudulent, or can be otherwise interpreted as

harmful content. Please contact us at [dpo@lightricks.com](mailto:dpo@lightricks.com) if you find any content to be offensive. **The use of the AI technologies is subject to the AI Terms as well, available at: <https://static.lightricks.com/legal/ai-terms-of-use.pdf#page18>.**

**TABLE C: POPULAR PAYS MARKETPLACE & CAMPAIGN TOOLS**

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS
<p><b><u>Brands Registration and Account:</u></b></p> <p>When the Brands sign up on Popular Pays Marketplace or the Campaign Tools, it shall fill in the contact information of its authorized users (name, phone number, email address, etc.).</p> <p>Following registration and creation of the Brand account, the Brand will have access to the dashboard which will include further data regarding its campaigns, statistics and analysis regarding its campaigns, user engagement, etc.</p>	<p>We use this information to create an account, provide account management, enable your interaction with the Creators and, as applicable, usage of the Campaign Tools, perform the marketing campaigns, provide support and any requested Services.</p> <p>The campaign insights are provided in an aggregated analytic manner.</p>	<p>Processing is necessary for the performance of our contract with the Brand.</p> <p>Data processed for campaign insights is processed by us on behalf of the Brand, in our role as <b>Processor</b> (as such terms is defined under the GDPR or equivalent term under applicable laws), as further detailed below.</p>
<p><b><u>Creator Registration and Account:</u></b></p> <p>A Creator will need to create a portfolio and account which will include full name, email address, age, gender, location, shipping address, demographic data, payment information (which will include your bank account details or Apple-Pay/Google-Pay account), your profession or specializations (e.g., lifestyle, fashion, beauty, financing planning), language preferences, etc.</p> <p>You will further be requested to grant us with access to your social media account ("<b>Creator Social Media Accounts</b>"). We will process certain information made available through the</p>	<p>We use the Creator Portfolio Data to create and verify your account, including the portfolio, and to make it available for Brands to review, enable your interaction with the Brands, provide account management, provide support and any requested Services.</p> <p>We will further use the Creator Portfolio Data to create aggregated insights on your audience and content (e.g., gender, age range, geo location, etc.) in order to enable our Services, including to enable "match" between you and the applicable Brands' needs (e.g., the targeted audience for the Brand's campaign).</p>	<p>Creator Portfolio Data is necessary for the performance of our contract with the Creator.</p> <p>The insights are processed subject to our legitimate interest.</p> <p>The creations you upload may also include Personal Data, however, we are the <b>Processor</b> (as such terms is defined under the GDPR or equivalent term under applicable laws) of such Personal Data, hosting the creations on your behalf.</p>

<p>Creator Social Media Accounts such as profile picture and information related to your followers (followers count, age range, territories, etc.)</p> <p>The above shall be collectively referred to as “<b>Creator Portfolio Data</b>”.</p> <p>In addition, in order to participate in campaigns, the Creator will need to upload its creations to the portfolio, integrate its social media accounts through which Brands will be able to review the Creator’s work, bio and the type of followers the Creator interacts with.</p>		
<p><b><u>Content On Creator Media Processed for Brands’ Evaluation Process:</u></b></p> <p>- <u>Creators:</u></p> <p>Upon Creators’ registration to our Popular Pays Marketplace, we may process the content, posted, uploaded or otherwise made available by Creator through the Creator media network, including the Creator’s Social Media Accounts or other applicable media such as websites, blogs, posts, etc. (respectively the “<b>Media</b>”).</p> <p>- Non-Registered Creators:</p> <p>We may process the content made available on Media from individuals that have not signed-up to our Popular Pays Platform (“<b>Non-Registered Creators</b>”), in the event a Brand request us to conduct an evaluation process with</p>	<p>We process the Creator Media Content as part of our Services and Campaign Tools, to support the Brands’ process of evaluating your applicability to their advertising campaign, in connection with the Brands’ certain criteria related to the reputation they wish to maintain when running marketing campaigns and their content restrictions policies.</p> <p>For such process, certain Creator Media Content will be processed by us, including by using automated tools and AI tools, to indicate if certain content criteria might be included.</p> <p>The Creator Media Content evaluation process is intended to ensure Creators’ and Non-Registered Creators’ applicability and compliance with our Brands’ criteria and codes of conducts, prior to</p>	<p>The processing related to our registered Creators is made based on contract necessity.</p> <p>The processing related to Non-Registered Creators is made based on our and our Brands’ legitimate interest, to offer you to join our Popular Pays Marketplace and potentially participate in the Brands’ campaigns, and to provide a service enabling to conduct a prior evaluation and a vetting process of content creators and influencers applicability to Brands’ marketing campaigns, prior to offering participation. Non-Registered Creators has the right to opt-out from our processing of such information by submitting their request at <a href="#">here</a>, or by sending us an email at: <a href="mailto:dpo@lightricks.com">dpo@lightricks.com</a>.</p>

<p>regards to the Non-Registered Creator and in such event, we may further process your email address or other contact communications, your Social Media Account and certain information made available therein such as your name, profile picture, social media accounts, and audience (followers count, territory, etc.).</p> <p>The content processed uploaded to the Media by Creators and Non-Registered Creators, which may include, without limitations, images videos and posts, shall be collectively referred to as the “<b>Creator Media Content</b>”)</p>	<p>offering the Creator or Non-Registered Creator to participate in such Brand’s marketing campaign.</p> <p><u>We will store and maintain the specific Creator Media Content indicated as content that includes certain categories and criteria for the provisions of the Services (to Creators and Brands, as applicable) as well as for future evaluation of potential cooperation and engagement with Creators and No-Registered Creators by our Brands.</u></p> <p>The information we provide our Brands is intended solely to assist their vetting process however we do not, and we prohibit our Brands, to use this information for any automated decision making or profiling purposes. The information is provided to our Brands subject to contractual obligations that limit the use to the purposes described above and prohibits the unauthorized use of the information.</p> <p>We further process the Non-Registered Creator contact information to communicate with you and offer you participation in our Service or collaboration with a Brand, etc.</p>	
<p><b>Usage Data:</b></p> <p>We collect information on how, when and where you use the Service, access the account, and actions conducted on the Popular Pays Marketplace or through the usage of our Campaign Tools, as applicable.</p>	<p>We use this information solely for the purpose of improving the Services, fixing bugs and errors.</p>	<p>Processing of such data is made subject to our legitimate interest.</p>



<p><b><u>Customer Support:</u></b></p> <p>When you contact us for customer support, we will process your contact information, as well as any information you choose to provide as part of our communications and correspondence and, where applicable, our call records.</p>	<p>We will use the contact information to provide the customer support needed. We will retain the correspondence with you, and where applicable the call records, for as long as needed, and to evidence the support was provided, offers being made or agreed, etc., as well as to further improve our Services and support.</p>	<p>We process such information to provide the support services for performing our contract with you.</p> <p>We will further retain our communications for records keeping and services improvement, including to train our customer support team, based on our legitimate interest.</p> <p>Call records will be processed subject to your consent which will be obtained at the beginning of our conversation.</p>
<p><b><u>Direct Marketing:</u></b></p> <p>We will use your information and contact information to send you marketing promotions, such as new features, additional offerings, special opportunities or any other information we think you will find valuable.</p>	<p>We process and use this information to keep you updated with offers and content.</p>	<p>We process such information subject to our legitimate interest. You can opt-out at any time through the “<b>unsubscribe</b>” link within the email at any time, provided however that operational and service-related messages (e.g., invoices) will still be sent.</p>
<p><b><u>Campaigns:</u></b></p> <p>As a Brand, we provide services that enable you to deliver relevant content to end users, by targeting specific audience.</p> <p>The targeted campaign will be directed to potential customers who appear to have the same or similar interests as the Brand’s existing customers, based on the segments we collect and analyze (“<b>Insights</b>”).</p>	<p>We use such Insights for targeting campaigns on behalf of the Brand, as part of the services provided through the Popular Pays Marketplace.</p>	<p>We process this data on behalf of the Brand as a <b>Processor</b> (as such terms is defined under the GDPR or equivalent term under applicable laws) and subject to the Brand’s instructions.</p>
<p><b><u>Booking a Demo:</u></b></p> <p>In the event you choose to book a free demo, you will be requested to provide us with your full name, phone number, and company email address.</p>	<p>We will use this information to provide you with the information or Services that you have requested, as well as for Direct Marketing (as explained above).</p>	<p>We process such information subject to our legitimate interest.</p>

<p><b><u>Purchase and Transactions</u></b> <b><u>Details:</u></b></p> <p>Certain features and Services are subject to payment, either IAP in which Google Play or Apple Store terms would govern such payments, or subscription payments by third party payment processor services (such as <a href="#">Adyen</a>, Stripe, Braintree, and <a href="#">PayPal</a>); however, we process the commercial transaction data such as, records of transactions, amounts, purchases and prices; shipping details (if applicable); address, contact telephone number and email address.</p>	<p>We use this information to process your payments, perform the Services and transactions.</p> <p>Any information related to your payment means and the transactions are processed by the third parties' platforms or IAP will be governed by such third parties' own privacy policy and terms, which we recommend that you review.</p>	<p>We process such information to provide the Services and perform our contract with you.</p> <p>We may further use such information to analyze our Services and their performance, as well as to customize and improve our offers and Services, based on our legitimate interests.</p>
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**TABLE D: PROSPECTS AND INDIVIDUALS INTERACTION WITH OUR WEBSITE, ADS OR DIGITAL ASSETS**

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS
<p><b><u>Online Identifiers and Usage</u></b> <b><u>Data:</u></b></p> <p>When you interact with our website or other digital assets, we, directly or indirectly collect Online Identifiers and Usage Data (i.e., access time and date, movement within the website, click stream, duration, referred URLs, content viewed, etc.).</p>	<p>We process this information to improve the website, identify errors and bugs as well as for statistic, analytic and marketing purposes.</p>	<p>The Personal Data processed for operating the website and our digital assets, through first party cookies, is based on our legitimate interest.</p> <p>Depending on your jurisdiction, third-party cookies will be able to process Personal Data solely if you provided consent through the consent management tool that is used on the website.</p> <p>You may withdraw consent or otherwise change your preferences at any time by using the cookie preference settings tool.</p>
<p><b><u>Advertising:</u></b></p> <p>When we market the Services, we use third party providers or tools to manage these ad campaigns. Through these tools, we collect information such as</p>	<p>To perform, facilitate and optimize our marketing campaigns, ad management and sales operations, and to manage and deliver advertisements for our</p>	<p>We process the Personal Data subject to your consent through in-app permission or cookie consent management tool, as applicable.</p>

<p>the individuals' journey, when they clicked our ad and if they subscribed or engaged with such campaign or ad.</p>	<p>products and Services more effectively, including on other websites and applications.</p>	
<p><b>Contact Information:</b></p> <p>If you voluntarily contact us through chat, email or other means, or if you fill in a survey, or provide feedback, you will be required to provide us with certain information such as your name, email address, and any additional information you decide to share with us.</p> <p>If you are contacting us on behalf of another person, we value your assistance and care for others, please note that it is your responsibility to make sure that any person whose Personal Data you provide is aware of the principles of this Privacy Policy and agrees that you will provide Personal Data to us on this basis.</p>	<p>We process the information to respond to your inquiry. We may also process the correspondence information in order to improve our sales services or customer support and for record keeping purposes.</p>	<p>We process the information subject to our legitimate interest. We may keep such correspondence if we are legally required to or where we otherwise deem it is needed.</p>
<p><b>Call Records:</b></p> <p>When contacting our Prospect, we might record the calls.</p>	<p>We use such call records in order to manage, measure and improve our sales efforts and enhance our Services.</p>	<p>We process call records subject to your consent which will be obtained at the beginning of our conversation.</p>
<p><b>Newsletter Registration:</b></p> <p>In the event you sign up to receive our newsletter, blog updates or other marketing materials, you will be requested to provide your contact details, such as your email address.</p>	<p>We will use your information in order to send you our newsletter and other marketing materials.</p>	<p>We process such contact information subject to your consent. You may withdraw consent at any time through the "unsubscribe" link within the email or by contacting us directly.</p>

Please note that the actual processing operation per each purpose of use and lawful basis detailed in the table above may differ. Such processing operation usually includes a set of operations made by automated means, such as collection, storage, use, disclosure by transmission, erasure, or destruction. The transfer of Personal Data to third-party countries, as further detailed below under *International Data Transfer* Section, is based on the same lawful basis as stipulated in the table above.

In addition, we may use certain Personal Data to prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity thefts, and any other misuse of the Services and to enforce the Terms,

as well as to protect the security or integrity of our databases and the Services, and to take precautions against legal liability. Such processing is based on our legitimate interests.

We may collect different categories of Personal Data and Non-Personal Data from you, depending on the nature of your interaction with the Services provided through the website, Apps, web-services and the Popular Pays Marketplace, as detailed above. If we combine Personal Data with Non-Personal Data, the combined information will be treated as Personal Data for as long as it remains combined.

## **5. HOW WE COLLECT YOUR INFORMATION**

Depending on the nature of your interaction with us, we may collect the above detailed Personal Data from you, as follows:

- Automatically, when you visit our website or interact with our App and Services, including through the use of cookies (as detailed below) and similar tracking technologies, as well as, where applicable, information gathered through our Campaign Tools.
- When you voluntarily choose to provide us with information, such as when you create an account, contact us or request a demo, all as detailed in this Policy.
- By our third parties service providers which collect Personal Data on our behalf, such as analytics service providers.

## **6. COOKIES AND SIMILAR TECHNOLOGIES**

We may use cookies, tracking pixels (also known as clear GIFs and web beacons), third party software development kits (SDKs) as detailed in [Table A](#) above, and other technologies in order to maintain, provide, and improve our website, Apps and Services. **We use Cookies for various purposes:**

- **Strictly Necessary Cookies:** these cookies are necessary for our website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but then some parts of the website will not work.
- **Functional Cookies:** these cookies enable the website to provide enhanced functionality and personalization (e.g., remembers your preferences so you don't have to re-set them each time you visit). They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies then some or all of these services may not function properly.
- **Performance and Analytics Cookies:** these cookies allow us to count visits and traffic sources so we can measure and improve the performance of our website. They help us to know which pages are the most and least popular and see how visitors move around the website. If you do not allow these cookies we will not know when you have visited our website, and will not be able to monitor its performance.
- **Marketing and Targeting Cookies:** these cookies allow us to know whether or not you've seen an ad or a type of ad, how you interacted with such an ad, and how long it has been since you've seen it. We also use cookies to help us with targeted advertising. We may partner with ad networks and other ad serving providers that serve ads on behalf of us and others on non-affiliated platforms. Some of those ads may be personalized, meaning that they are intended to be relevant to you based on information ad networks and ad serving providers collect about your use of our website and other sites or apps over time, including information about relationships among different browsers and devices. This type of advertising is known as interest-based advertising.

The third-party cookies we currently use and purpose of use are listed under the Cookies Setting tool available on our website, which you may further use to opt-out of cookies or change your preferences ant any time.

Also note that, most browsers will allow you to erase cookies from your computer’s hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. You may set your browser to block all cookies, including cookies associated with our website, or to indicate when a cookie is being used by us, by adjusting the privacy and security settings of your web browser. Please refer to the support page of your browser to learn more about how you can adjust your privacy and security settings. Please note that once you choose to opt out or disable cookies, some features of the website may not operate properly and your online experience may be limited.

Where we use third-party advertising cookies, such third-party may independently collect, through the use of such tracking technologies, some or all types of Personal Data detailed above, as well as additional data sets, including to combine such information with other information they have independently collected relating to your online activities across their network of websites, for the purpose of enhanced targeting functionality and delivering personalized ads, as well as providing aggregated analytics related to the performance of our advertising campaign you interacted with. These third parties collect and use this information under their own privacy policies, and are responsible for their practices.

**7. DATA SHARING – CATEGORIES OF RECIPIENTS WE SHARE PERSONAL DATA WITH**

We share your Personal Data with third parties, including our partners or service providers that help us provide our Services. You can find here information about the categories of such third-party recipients.

CATEGORY OF RECIPIENT	DATA THAT MAY BE SHARED	PURPOSE OF SHARING
Essential Service Providers, which process data on our behalf, for the purpose of providing the Services, securing and improving the Services.	All data <b>except</b> for data which is stored locally on your device.	We may disclose Personal Data to our trusted service providers that provide technology or platforms that are essential for providing the Services (“ <b>Essential Service Providers</b> ”). Such Essential Service Providers include hosting, and server co-location services, communications and content delivery networks (CDNs), internet service providers, operating systems and platforms, data and cyber security services, fraud detection services, billing and payment processing services, shipping and handling services, session or activity recording services, AI tools, support and customer relation management systems. Essential Service Providers have access, or process on our behalf. The Essential Service Providers are prohibited from using your Personal Data for any purposes other than providing us with requested services.
Marketing Service Providers	Usage Data, Online Identifiers, Registration Data, Account Data, and	Our marketing service providers, that either process on our behalf certain data which we use to target you and offer you our Services, or they provide us with tools to do so (“ <b>Marketing Service Providers</b> ”).

	profiling or behavioral data.	
Consultants	Account Data and Registration data, contact information, and any other data except for data which is stored locally on your device.	Our legal, financial and compliance advisors (“ <b>Consultants</b> ”) may be exposed to certain Personal Data. The Consultants are bound by privilege obligations or confidentiality agreements and are prohibited to share any Personal Data except for providing the services we requested.
Third-Party Platforms & Brands	Registration data, creations, Popular Pays Marketplace and Campaign Tools activity, Creator Media Content.	<p>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. Moreover, if the Services integrate with a third-party service, the API that performs the integration will enable the relevant third party to serve you certain content as well as access some of your content. For example, if you wish to upload or otherwise share your 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 content (such as your photo library).</p> <p>In addition, we share certain Personal Data gathered from Creators with Brands participating in our Popular Pays Marketplace or using the Campaign Tools, including Creator Profile and Creator Media Content, as defined and explained under Table C above.</p>
Other Users	Creations, name, contact information, bio.	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, likes and comments on other content. We will never share your photos or videos with other Users unless you actively choose to do so.
Subsidiaries and Affiliated Companies	All data <b>except</b> for data which is stored locally on your device.	We may share Personal Data, internally within our group or in the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation or asset sale). In the event of the above, our affiliated companies or acquiring company will assume the rights and obligations as described in this Policy.

Third Parties, Authorities, Security Providers, Governmental Agencies, or Authorized Third Parties.	Any data <b>except</b> for data which is stored locally on your device, depending on the purpose and needs.	For protecting rights and safety of our Services and Apps, 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 users or individuals, or any members of the general public. This will include legal and law enforcement purposes, meaning, in response to a verified request relating to terror acts, criminal investigations or alleged illegal activity or any other activity that may expose us, you, or any other user to legal liability, and solely to the extent necessary to comply with such purpose. 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 services.
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When we share data with service providers and partners, we ensure they only have access to such information that is strictly necessary for us to provide the Services. These parties are required to secure the data they receive and to use the data for pre-agreed purposes only while ensuring compliance with all applicable data protection regulations (such service providers may use other Non-Personal Data for their own benefit).

## 8. USER RIGHTS

We acknowledge that different people have different privacy concerns and preferences. Our goal is to be clear about what information we collect so that you can make meaningful choices about how it is used. We allow you to exercise certain choices, rights, and controls in connection with your information. Depending on your relationship with us, your jurisdiction and the data protection laws that apply to you, you have the right to control and request certain limitations or rights to be executed.

For detailed information on your rights and how to exercise your rights, please see the Data Subject Request Form (“DSR”) form available [here](#) and send it to our DPO: [dpo@lightricks.com](mailto:dpo@lightricks.com).

Further, certain rights can be exercised from the App: you may correct, revise and delete information using the App settings at any time, any consent provided may be easily withdrawn (for example, for Face Models and Voice Models, through the App settings), and you may opt-out from certain features and tracking, therefore we recommend you use the technical solutions we have provided you with to exercise your rights. Please further note that, AI Tools Output may contain Personal Data about you that you deem inaccurate, and if you would like us to correct the inaccuracy you may submit a correction request as detailed above, however given the technical complexity of how our AI tools work, we may not be able to correct the inaccuracy in every instance. In that case, you may request that we delete your Personal Data from the AI Tools Outputs.

## 9. DATA RETENTION

In general, **unless a different retention period is described above**, we retain the Personal Data we collect for as long as it remains necessary for the purposes set forth above, when permissible by law or regulation, or until you request to delete your information, where applicable.

Other circumstances in which we may retain your Personal Data for longer periods of time when permissible by law or regulation include: (i) where we are required to do so in accordance with legal, regulatory, tax, or accounting requirements; (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges; or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data.

Please note that except as required by applicable law or our specific agreements with you, we will not be obligated 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](mailto:dpo@lightricks.com).

## **10. SECURITY MEASURES**

We implement appropriate and industry-standard 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, the security of your Personal Data depends on you as well. Please make sure to take appropriate measures to use secured networks, devices and to protect your access credentials.

Please contact us at: [dpo@lightricks.com](mailto:dpo@lightricks.com) if you feel that your privacy was not dealt with properly, in a way that was in breach of our Privacy Policy, or if you become aware of a third party's attempt to gain unauthorized access to any of your Personal Data. We will make a reasonable effort to notify you and the appropriate authorities (if required by applicable law) in the event that we discover a security incident related to your Personal Data.

## **11. INTERNATIONAL DATA TRANSFER**

Our data servers in which we host and store the information are located globally including in the US and EU. The headquarters are based in Israel where we may access the information stored on local servers, cloud-hosting servers or other systems and platforms used. In the event that we need to transfer your Personal Data out of your jurisdiction, we will take appropriate measures to ensure that your Personal Data receives an adequate level of protection as required under applicable law. Furthermore, when Personal Data that is collected within the European Economic Area ("EEA"), United Kingdoms or Swiss, is transferred outside of such jurisdiction, to a country that has not received an adequacy decision from the European Commission or the ICO, we will take necessary steps in order to ensure that sufficient safeguards are provided during the transferring of such Personal Data, in accordance with the provision of the EU, UK or Swiss Standard Contractual Clauses. Thus, we will obtain contractual commitments or assurances from the data importer to protect your Personal Data, using contractual protections that regulators have pre-approved to ensure your data is protected.

## **12. ELIGIBILITY AND CHILDREN PRIVACY**

The Services are not intended for use by children (the phrase "child" shall mean an individual that is under the age defined by applicable law), and we do not knowingly process children's information. We will discard any information we receive from a User that is considered a "child" immediately upon discovering that such a User shared information with us. Please contact us at: [dpo@lightricks.com](mailto:dpo@lightricks.com) if you have reason to believe that a child has shared any information with us. Where required under applicable laws, we will require parental consent for participation in our Services related to the Popular Pays Marketplace by individuals under the applicable age.



### 13.SPECIFICATIONS

#### i. Additional Notice to California Residents:

This section applies only to California residents. Pursuant to the California Consumer Privacy Act of 2018 (“CCPA”) effective November 2020, and as amended by the CPRA, effective January 1, 2023.

Please see the CCPA Privacy Notice which discloses the categories of personal information collected, purpose of processing, source, categories of recipients with whom the personal information is shared for a business purpose, whether the personal information is sold or shared, the retention period, and how to exercise your rights as a California resident.

#### ii. Additional Notice to Colorado Residents:

Under the Colorado Privacy Act (“CPA”) if you are a resident of Colorado, acting **only** as an individual or household context (and **not** in a commercial or employment context, as a job applicant or as a beneficiary of someone acting in an employment context), your rights with respect to your personal data are described below.

“**Personal Data**” as defined in the CPA means: “information that is linked or reasonably linkable to an identified or identifiable individual” and does **not** include any of the following: publicly available information, de-identified or aggregated consumer, and information excluded from the CPA scope, such as: Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPPA) or 42 CFR Part 2-“Confidentiality of Substance Use Disorder Patient Records”, Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or and the Driver’s Privacy Protection Act of 1994, Children’s Online Policy Protection Act of 1998 (COPPA), Family Educational Rights and Privacy Act of 1974, national Security Exchange Act of 1934, higher education data and employment data.

“**Sensitive Data**” includes (i) racial or ethnic origin, religious beliefs, mental or physical health condition or diagnosis, sex life or sexual orientation; (ii) genetic or biometric data that can be processed to uniquely identify an individual; or (iii) child data. We do not process or collect any sensitive data. Please note, however, that while we do not deem Voice Models, Face Models or other such data we collect to be biometric data under the CPA because they are not used to uniquely identify an individual, we will obtain your consent before processing such Personal Data. You may exercise your rights, at any time, including to withdraw consent for us to process your Face Models and Voice Models or request its deletion (as part of a deletion request of all your information and your account, as detailed below).

Under [section 4](#) “PURPOSE, LAWFUL BASIS, AND PROCESSING OPERATIONS” of the Privacy Policy, we describe our collection and processing of personal data, the categories of personal data that are collected or processed, and the purposes. Additionally, the Section describing the “[DATA SHARING – CATEGORIES OF RECIPIENTS WE SHARE PERSONAL DATA WITH](#)” details the categories of third-parties the controller shares for business purposes.

#### Your Rights Under CPA:

Herein below, we will detail how consumers can exercise their rights, and appeal such decision, or if we sell the personal data, or sell the personal data for advertising and how to opt-out.

<b>Right to Access/ Right to Know</b>	You have the right to confirm whether and know the Personal Data we collected on you	You can exercise your right by reviewing this Privacy Policy, in case you would like to receive the Personal Data please fill in <a href="#">the DSR</a> form to receive a copy of your data
<b>Right to Correction</b>	You have the right to correct inaccuracies in your Personal Data, taking into account the nature of the Personal Data and	You can exercise this right directly through your account or by filling in <a href="#">the DSR</a> form

	the purposes of the processing of your Personal Data.	
<b>Right to Deletion</b>	<p>You have the right to delete the Personal Data, this right is not absolute and in certain circumstances we may deny such request. We may deny your deletion request, in full or in part, if retaining the information is necessary for us or our service provider(s) for any of the following reasons: <b>(1)</b> Complete the transaction for which we collected the Personal Data, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you; <b>(2)</b> Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities; <b>(3)</b> Debug products to identify and repair errors that impair existing intended functionality; <b>(4)</b> Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law; <b>(5)</b> Comply with the law or legal obligation; <b>(6)</b> Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair</p>	<p>If you would like to delete your Personal Data please fill in <a href="#">the DSR</a> form</p> <p>You do not need to create an account with us to submit a request to delete.</p> <p>You may also request deletion directly through the App settings without filling in the DSR form.</p>

	<p>the research’s achievement, if you previously provided informed consent; <b>(7)</b> Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us; <b>(8)</b> Make other internal and lawful uses of that information that are compatible with the context in which you provided it.</p> <p>We will delete or de-identify personal information not subject to one of these exceptions from our records and will direct our processors to take similar action.</p>	
<p><b>Right to Portability</b></p>	<p>You have the right to obtain the personal data in a portable, and to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance.</p>	<p>If you would like to receive the Personal Data please fill in <a href="#">the DSR</a> form.</p> <p>We will select a format to provide your Personal Data that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.</p>
<p><b>Right to opt out from selling Personal Data</b></p>	<p>You have the right to opt out of the sale of your Personal Data for the purposes of targeted advertising, sale to a third party for monetary gain, or for profiling in furtherance of decisions that produce legal or similarly significant effects concerning you or any other consumer.</p> <p>You may authorize another person acting on your behalf to opt out (including by technical tools and opt out signals).</p> <p>We do <b>not</b> profile you in a manner that has significant effect of you or and other consumer, therefore there isn’t an opt-out option.</p>	<p>To opt out from the use of cookies on our website please click the “do not sell or share my personal information” button which will enable you to customize the use of cookies on our website and Apps. You may also opt-out through the Apps’ settings. You may further opt out through device settings (opt-out from tracking AAID, ADID, please see the following for information applicable to all devices: <a href="https://thenai.org/opt-out/mobile-opt-out/">https://thenai.org/opt-out/mobile-opt-out/</a>), or by using Self-Regulatory Program for Online Behavioral Advertising such as: Digital Advertising Alliance’s (“DAA”): <a href="https://www.aboutads.info/choices">https://www.aboutads.info/choices</a>; Network Advertising Initiative (“NAI”): <a href="https://www.networkadvertising.org/choices">https://www.networkadvertising.org/choices</a> .</p> <p>Last, you are able to install privacy-controls in the browser's settings to automatically signal the opt-out preference to all websites you visit (like the “<a href="#">Global Privacy Control</a>”).We</p>
<p><b>Right to opt out from Targeted Advertising</b></p>		

	We do <b>not</b> “sell” or “share” information as most people would commonly understand that term, we do not, and will not, disclose your Personal Information or Personal Data in direct exchange for money or some other form of payment, however, we do share Personal Information or Data for analytic and marketing purposes, including targeted advertising, when we promote our Apps or Services. In most cases we obtain Personal Data, or Personal Information collected automatically from our Apps and your actions therein, and combine it with your actions on other of our Apps, if applicable, however not with third party apps.	honor the Global Privacy Control as a valid request to opt-out of the sharing of information linked to your browser.
<b>Right to opt out from Profiling</b>		
<b>Right to Appeal</b>	If we decline to take action on your request, we shall so inform you without undue delay, within 45 days of receipt of your request. The notification will include a <b>justification</b> for declining to take action and instructions on <b>how you may appeal</b> .	Not more than 60 days after receipt of an <b>appeal</b> we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reason for the decisions.
<b>Duty not to violate the existing laws against discrimination or non-discrimination</b>	Such discrimination may include denying a good or service, providing a different level or quality of service, or charging different prices.	We do not discriminate our users.

### How to Submit a Request Under CPA?

Only you, or someone legally authorized to act on your behalf, may make a request to **know** or **delete** related to your Personal Data. If the [DSR](#) is submitted by someone other than the consumer about whom information is being requested, proof of authorization (such as power of attorney or probate documents) will be required.

We will respond to your request within 45 days after receipt of a verifiable consumer request and for no more than twice in a twelve-month period. We reserve the right to extend the response time by an additional 45 days when reasonably necessary and provided consumer notification of the extension is made within the first 45 days. If we refuse to take action on a request, you **may appeal our decision** within a reasonable time period by contacting us at [dpo@lightricks.com](mailto:dpo@lightricks.com) and specifying you wish to appeal. Within 60 days of our receipt of your appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied, you may submit a complaint as follows: Colorado AG at <https://coag.gov/file-complaint/>

If you have an account with us, we may deliver our written response to that account or via email at our sole discretion. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. You do not need to create an account for submitting a request.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

### iii. **Additional Notice to Virginia Residents:**

Under the Virginia Consumer Data Protection Act, as amended (“**VCDPA**”) if you are a resident of Virginia acting in an individual or household context (and **not** in an employment or commercial context), you have the following rights with respect to your Personal Data.

The VCDPA defined “**Personal Data**”, and “**Sensitive Data**” as detailed above under “[Additional Notice to Colorado Residents](#)”. Please note that we do not deem Face Models, Voice Models or other such data to be sensitive biometric data under the VCDPA because they are not used to uniquely identify an individual. However, we will obtain your consent before processing such Personal Data. You may exercise your rights, at any time, including to withdraw consent for us to process your Face Models and Voice Models or request its deletion (as part of a deletion request of all your information and your account, as detailed below).

The VCDPA requires us to disclose the Categories of data processing and the purpose of each category, as detailed in [Section 4](#) “PURPOSE, LAWFUL BASIS, AND PROCESSING OPERATIONS” of the Privacy Policy, the categories of data shared and the third parties with whom it is shared, as detailed in the “[DATA SHARING – CATEGORIES OF RECIPIENTS WE SHARE PERSONAL DATA WITH](#)” Section. Disclosure of sale of data or targeted advertising are detailed in the [User Rights](#) Section above, and in the [DSR Form](#). Further, the table above under “[Additional Notice to Colorado Residents](#)” details the rights you have under VCDPA and how you may exercise your rights.

### **How to Submit a Request Under VCDPA?**

We shall respond to your request within 45 days of receipt. We reserve the right to extend the response time by an additional 45 days when reasonably necessary and provided consumer notification of the extension is made within the first 45 days. If we refuse to take action on a request, you may appeal our decision within a reasonable period time by contacting us at [dpo@lightricks.com](mailto:dpo@lightricks.com) and specifying you wish to appeal. Within 60 days of our receipt of your appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied, you may submit a complaint as follows: Virginia Attorney General at <https://www.oag.state.va.us/consumercomplaintform>

We shall provide information in response to your request free of charge, up to twice annually, unless requests are manifestly unfounded, excessive or repetitive. If we are unable to authenticate your request using commercially reasonable efforts, we may request additional information reasonably necessary to authenticate you and your request. If we cannot authenticate you and your request, we will not be able to grant your request.

#### **iv. Additional Notice to Connecticut Residents:**

Under the Connecticut Data Privacy Act, Public Act. No. 22-14 (the “**CDPA**”) if you are a resident of Connecticut, acting in an individual or household context (and **not** in a commercial or employment context or as a representative of business, non-profit or governmental entity), your rights with respect to your personal data are described below.

“**Personal data**” means any information that is linked or reasonably linkable to an identified or identifiable individual. It does **not** include de-identified data or publicly available information. It further does not include information excluded from the scope such as: HIPAA, GBPA, non-profit entities, higher education, employment data and FCRA, Driver's Privacy Protection Act of 1994, Family Educational Rights and Privacy Act, Farm Credit Act.

“**Sensitive Data**” means data revealing racial or ethnic origin, religious beliefs, mental or physical health condition or diagnosis, sex life, sexual orientation, citizenship, or immigration status; The processing of genetic or biometric data for the purpose of uniquely identifying an individual; Personal Data collected from a known child; precise geolocation data. Please note that we do not deem Face Models, Voice Models or other such data to be sensitive biometric data under the CDPA because they are not used to uniquely identify an individual. However, we will obtain your consent before processing such Personal Data. You may exercise your rights, at any time, including to withdraw consent for us to process your Face Models and Voice Models or request its deletion (as part of a deletion request of all your information and your account, as detailed below).

The categories of personal data processed, purpose of processing, are as detailed in [Section 4](#) “PURPOSE, LAWFUL BASIS, AND PROCESSING OPERATIONS”, categories of personal data shared with third parties, categories of third parties with whom data is shared, are detailed in the “[DATA SHARING – CATEGORIES OF RECIPIENTS WE SHARE PERSONAL DATA WITH](#)” Section. Disclosure of sale of data or targeted advertising are detailed in Section 8 “[USER RIGHTS](#)”, and in the [DSR Form](#).

Instructions on how to exercise your rights are detailed in the table above under “[Additional Notice to Colorado Residents](#)” including the rights you have under CDPA and how you may exercise your rights. In addition to the table above, under CDPA you also have the right to withdraw consent which shall be provided within 15 days.

#### **How to Submit a Request Under CDPA?**

We shall respond to your request within 45 days of receipt. The response period may be extended once by 45 additional days when reasonably necessary, taking into account the complexity and number of requests and we inform you of such extension within the initial 45-day response period, together with the reason for the extension.

If we decline to take action on your request, we shall so inform you without undue delay, within 45 days of receipt of your request. The notification will include a justification for declining to take action and instructions on how you may appeal. Within 60 days of our receipt of your appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied, you may submit a complaint to the Connecticut Attorney General at link: <https://www.dir.ct.gov/ag/complaint/> or (860) 808-5318.

We shall provide information in response to your request free of charge, up to twice annually, unless requests are manifestly unfounded, excessive or repetitive. If we are unable to authenticate your request using commercially reasonable efforts, we may request additional information reasonably necessary to authenticate you and your request. If we cannot authenticate you and your request, we will not be able to grant your request.

#### **v. Additional Notice to Utah Residents:**

Under the Utah Consumer Privacy Act (the “**UCPA**”) if you are a resident of Utah, acting in an individual or household context (and **not** in a commercial or employment context) your rights with respect to your personal data are described below. The UCPA defined “**Personal Data**” and “**Sensitive Data**” as detailed above under

[“Additional Notice to Colorado Residents”](#). Please note that we do not deem Face Models and Voice Models or other such data to be sensitive biometric data under the UCPA because they are not used to uniquely identify an individual. However, we will obtain your consent before processing such Personal Data. You may exercise your rights, at any time, including to withdraw consent for us to process your Face Models and Voice Models or request its deletion (as part of a deletion request of all your information and your account, as detailed below). The categories of personal data processed, purpose of processing, are detailed in [Section 4](#) “PURPOSE, LAWFUL BASIS, AND PROCESSING OPERATIONS”, categories of personal data shared with third parties, categories of third parties with whom data is shared, are detailed in the [“DATA SHARING – CATEGORIES OF RECIPIENTS WE SHARE PERSONAL DATA WITH”](#) Section. Disclosure of sale of data or targeted advertising are detailed in Section 8 [“USER RIGHTS”](#) , and in the [DSR Form](#).

Further, the table above under [“Additional Notice to Colorado Residents”](#) details the rights you have under UCPA and how you may exercise your rights.

**vi. Additional Notice to Nevada Residents:**

Nevada law allows Nevada residents to opt out of the sale of certain types of personal information. Subject to several exceptions, Nevada law defines “sale” to mean the exchange of certain types of personal information for monetary consideration to another person. We currently do not sell personal information as defined in the Nevada law. However, if you are a Nevada resident, you still may submit a verified request to opt out of sales and will record your instructions and incorporate them in the future if our policy changes. You may send opt-out requests to us at [dpo@lightricks.com](mailto:dpo@lightricks.com) or through the DSR Form.

**vii. Additional Notice to Brazil Residents:**

We have created this section specifically for users in Brazil. Users in Brazil have certain privacy rights as specified under Brazilian law, including the Lei Geral de Proteção de Dados Pessoais (“**LGPD**”). Our Privacy Policy and the privacy controls we offer to all users are in line with these laws—this notice makes sure we cover the Brazil-specific requirements. For example, all users can request a copy of their data, request deletion, and control their privacy settings in the app.

Data Controller information is available above in Section 2.

The lawful basis under the LGPD is **Contract** (complying with the obligations of the agreement we have entered), **Legitimate Interest** (we have the right, the legitimate interest, to do so), **Consent** (we have asked your permission) and **Legal Obligations**. The Tables in Section 4 detail the lawful basis for processing each data set.