

# Privacy Policy

28 November 2023

## General

TopTap, (referred to hereafter as the “Company”, “we”, “us”, and/or “our”) provides this Privacy Policy to describe how we collect, use, and share the information of individuals who visit our websites (hereafter referred to as the “website”). This policy further describes how we utilize any related services.

The Company knows that you care about how your information may be used or shared and we are committed to ensuring it is kept secure and used carefully and within the confines of the law.

Below you will find a summary of how and why we collect and use your data, who we share it with, and what we are doing to make sure your data is safe and secure.

## Use and Treatment of Information

The Company informs the user that any information resulting from visiting its website or contracting its Products and Services will result in related Personal Data being included in an automated File duly registered in the General Register of the Data Protection as part of its automated processing system. For this end, you as the user express consent to such treatment.

The Company may use aggregated personal information (non-identifiable) to improve and adapt the service to the needs of the user. This statistical compilation of non-identifiable information may be used or provided to others for marketing purposes, advertising and research. The main goal of the Company in collecting personal information is to provide you, the user, with the most personalized experience possible. Information collected about you enables us to deliver content and advertising more relevant to you, and in turn a better service. Only the Company has access to the individual accounts. The Company may also do research on demographics, interests and behavior based on the information you provided during the registration process, on order forms, during a promotion, as well as information from our server log files or surveys. We do this to better understand and serve our users. This research is compiled and analyzed in aggregate bases and the Company may share this aggregated data with advertisers, researchers and other businesses. From time to time, the Company may use your personal information to send you information about our products and services or other products and services that may be of interest to you. You can unsubscribe from this mailing list by emailing us with the word “UNSUBSCRIBE” in the subject. The Company is the sole owner of information collected on the service. We will not sell, share or rent this information to others in any way that varies from what we specified in this statement. The Company maintains appropriate safeguards to ensure the security, integrity and privacy of Personal Data in its possession. However, as effective as these measures may be, no security system is impenetrable. We cannot guarantee the security of our database, nor can we guarantee that the information you provide will not be intercepted while being transmitted to us through the Internet.

## Information We Collect

Information collected by the servers: For operational purposes and quality assurance, we take

note of whether you use and, where appropriate, how you use the information and services we provide. For example, we record the service traffic patterns and store user access information, such as IP address, mobile device information, OS, browser, etc., on site files (logs). The Company's servers automatically collect certain non-personal information, such as which pages each user visits and the domain name of the visitors. We use this information for various purposes including internal review, traffic evaluation or adjusting information to individual visitors. A statistical compilation of this non-personal information may also be used and provided to others for marketing purposes, advertising or research.

**Use of cookies:** Every user visiting the website might receive a single cookie. A cookie is a small file that websites write to the hard disk drive of your computer when you visit them. A cookie file can contain information such as the ID that the site uses to track the pages you've visited. A cookie cannot read data from the hard disk drive of your computer or read cookie files created by other sites. We use cookies to keep an account of the traffic patterns of users. When you register, we use a cookie to store a unique ID. We use this ID to anonymously identify you in our database and to track the pages that you visit on the service, to determine initial usage versus repeat usage and to help target advertisements based on user interests. Cookies can also help us make adjustments to fit your interests and preferences. Some of our business partners may use cookies on the service (for example, advertisers). However, we have no access or control over these cookies. If you have installed your browser so that you receive a warning before accepting cookies, you will receive a warning for each cookie. You may refuse cookies in your browser leaving them inactive. However, The Company requires cookies for access.

**Personal information required by the Company in order to understand you and your needs:** We primarily know you through the information you provide when you register to access the service. The Company requests that you provide personal information to enhance your experience on the service. During the registration process, the Company asks for your name, email address, your city and country. The more accurate the information you provide, the better we can design the service for your experience. We may also request other information, at other times, such as when you enter a contest or participate in a promotion or when ordering services from The Company. You can correct or change information in your profile. You can change this information at any time and as often as deemed necessary.

## **How We Share Your Information**

The Company will not sell or rent to any Personal Data for money. The Company may share your personal information only when:

you authorize us to share this information, if at the time of registration, it was suggested to you in the data collection forms. Importantly, this is not a requirement to receive excellent service. This is completely optional,

we need to share this information to provide you a service you have requested,

you have been required by court order or law, or to protect the property rights or other rights of The Company. Your Personal Information may be shared with third parties, if we consider that

this is necessary to prevent, investigate or take action regarding illegal activities, crime or a violation of the law or the terms and conditions governing our various services, the Company

shares Personal Information to its partners, subsidiaries or affiliates that work with the Company or on behalf of the Company, under confidentiality agreements, who may use the Personal Information for marketing, advertising and research,

we may transfer your Personal Information if the Company or the service merge or consolidate with another company. If this takes place, you will be notified of such transfer before performing it. If you have given us your Personal Information, you give your express consent for the use and processing of your Personal Information as described above.

## **How We Protect Your Information**

The Company has implemented commercially reasonable managerial and technical safeguards designed to protect your personal information from accidental loss or unauthorized access, use, alteration or disclosure. We cannot guarantee that unauthorized third parties may not breach these safeguards, at any time, and use your personal information improperly. We cannot guarantee the security of information transmitted to us over the Internet and accept no liability for accidental disclosure of such information. You acknowledge that you provide your personal information at your own risk.

## **Data Subject rights**

### **1. Right of Access by the Data Subject**

You have the right to access your own Personal Data through the platform, as well as the right to request a copy of your personal data that is maintained and processed by our company.

### **2. Right of Rectification/Correction**

You have the right to request the correction of any incomplete and / or inaccurate Personal Data we hold for you.

### **3. Right to Erasure/Deletion**

You have the right to request the deletion of Personal Data only if permitted by the regulations and the law.

### **4. Right to Object**

You have the right to oppose the processing of your Personal Data at any time and for reasons related to a specific situation, unless there are compelling legitimate reasons for processing that override your interests, rights and freedoms.

### **5. Right to Restriction of Processing**

You reserve the right to request the restriction of processing on your Personal Data so that we may no longer process the specified Data until the restriction is lifted (for example, the data have been corrected).

### **6. Right to Data Portability**

You have the right to request the transfer of your personal data, which you have provided to our company. These data will be given to you in a format that is structured, widely used and

machine-readable and, in certain cases you may also have the right to request for us to send the Data to another organization, provided that such a transfer is technically feasible.

**7. Right to Object and Automated Individual Decision-Making (Including Profiling)** You have the right to request that we do not make any decision, regarding you, solely on the basis of automated processing, including profiling, only in the case that this decision has legal or significant consequences on you.

**9. Right to Opt-Out of Sale or Sharing for Cross-Context Behavioral Ads or Targeted Ads** We do not sell your Personal Data for money. However, you have the right to opt-out of sharing of your Personal Data for purposes of cross-context behavioral advertising or targeted advertising.

**9. Right to Appeal.**

You have the right to appeal to us concerning any decision that we make regarding your privacy rights.

To make a rights request, or for other questions regarding how we collect and use Personal Data, please contact us by sending an email to: [dpo@toptap.co](mailto:dpo@toptap.co)

**Compromise of Personal Information**

In the event that certain personal information is compromised as a result of a breach of security, where required by law, we will promptly notify the people whose personal information has been compromised, in accordance with the notification procedures set forth in this privacy policy, or as otherwise required by applicable law.

**Choices Regarding Your Information**

You have choices, outlined above under Data Subject Access Rights, which may include the ability to decline to accept how the information you provide will be used. In which case, the Company may not be able to provide you certain services.

**Children's Privacy**

Protecting the privacy of children is especially important. For that reason, the Company is not directed at children and does not knowingly collect or solicit personal information from anyone under the age of 18. If you are under 18, please do not send any personal information, including name, address, telephone or e-mail address. It is not allowed for anyone under the age of 18 to provide any personal information to the Company. In the event that we learn that we have personal information of someone under 18 without parental consent, we will terminate the account and delete all the personal information as quickly as possible. If you believe that we might have any information from anyone under 18, please contact us.

**Links to other sites**

We are not responsible for the practices employed by websites linked from our website/service or the information or contents contained therein. Please remember that when you use a link to

go from the service to another website, our Privacy Policy is no longer valid. Your browsing on any other website, including those linked from the service is subject to that website's own rules and its policies. Please read their rules and policies before proceeding.

## **Notifications**

We may use the information you send to the website/service, or through the website/service, to send emails and other messages related to the website/service and your use of the same. We reserve the right to notify you via but not limited to email, fax, text messages or voice, written or printed notices, messages posted to your user account or notices published on our site, as determined by the Company in its sole discretion. Notwithstanding the foregoing, the Company reserves the right to determine the manner and means by which we will provide notification to our customers or users of the service. By using the website/service, you agree to receive such notifications. We may use the information you send to the website/service, or through the website/service, to send emails and other messages related to the website/service and your use of the same. We reserve the right to notify you via but not limited to email, fax, text messages or voice, written or printed notices, messages posted to your user account or notices published on our site, as determined by the Company in its sole discretion. Notwithstanding the foregoing, the Company reserves the right to determine the manner and means by which we will provide notification to our customers or users of the service. By using the website/service, you agree to receive such notifications.

## **Amendments to Our Privacy Policy**

Please note that this Privacy Policy may change from time to time. We do not limit your rights under this Policy without your explicit consent. We expect most of the changes made will be minor. We will post the changes on the service site and, if they are significant, we will send a corresponding notice highlighting them, for example, a notification by email (in the case of certain services).

## **Contact Us**

If you have any questions about our Privacy Policy, the Company practices, or your relationship with the service, please do not hesitate to send an email to: [dpo@toptap.co](mailto:dpo@toptap.co).

## **Definitions**

**Data controller:** the natural or legal person, public authority, agency or other body, in this case IVT Innovexa Technologies Ltd, which, alone or jointly with others, determines the purposes and means of the processing of personal data.

**Personal Data:** information relating to an identified or identifiable natural person.