Toonimo Privacy Policy

Last Revised: June 22nd, 2021

Toonimo and its affiliates (**"Toonimo"**, **"we"** or **"us"**) respect the privacy of the users of the Website, Dashboard/Editor users and end-users utilizing the Service ("User" or "you"). We believe that you have a right to know our practices regarding the information we may collect and use when you use our Site or Service. Capitalized terms which are not defined herein, shall have the meaning as defined in our Terms of Use, into which this privacy policy (the **"Privacy Policy"**) is incorporated by reference.

1. **Your Consent (please read carefully!)** By accessing and/or using the Website and/or Dashboard/Editor and/or Service you agree to the terms and conditions set forth in this Privacy Policy, including if applicable to the collection and processing of your Personal Information (as defined below). If you disagree to any term provided herein, you may not use the Website, Dashboard/Editor or Service. FOR AVOIDANCE OF DOUBT IN CASES WHERE PERSONAL INFORMATION IS REQUIRED, YOU HEREBY CONSENT TO THE COLLECTION, PROCESSING, TRANSFER AND USE OF YOUR PERSONAL INFORMATION. YOU ALSO ACKNOWLEDGE AND CONFIRM THAT YOU ARE NOT REQUIRED TO PROVIDE US WITH YOUR PERSONAL INFORMATION AND THAT SUCH INFORMATION IS VOLUNTARILY PROVIDED TO US. TO THE EXTENT YOU ARE A "CUSTOMER" (AS DEFINED IN OUR TERMS OF USE), YOU CONFIRM THAT YOU HAVE OBTAINED ALL CONSENTS, PERMITS OR AUTHORIZATIONS (IF ANY) AS TO ENABLE US TO OFFER OUR SERVICE TO YOU AND/OR YOUR END-USERS; AND THAT YOU ARE, AND WILL CONTINUE TO BE, IN COMPLIANCE WITH APPLICABLE PRIVACY LAWS.

2. **Which information we may collect on our Users?** We collect two types of data and information:
   1. **Non-personal Information.** The first type is non-identifiable, aggregated and anonymous information derived from your use of the Website or Dashboard/Editor or Service (**"Non-personal Information"**). To put it simply, we do not know what is the identity of the User from which we have collected the Non-personal Information. Non-personal Information which is being gathered consists of technical information and behavioral information, such as: Technical information: * Type of operation system (e.g. Windows, Linux, etc.) * Type of Browser (e.g. Explorer, Firefox, Chrome, Safari, etc.) * Screen resolution (e.g. 800x600, 1024x768, etc.) * Browser and keyboard language (e.g. English) * Regional setting * IP address. (optional) * Flash version. * Computer's configurations and settings and any similar technical data and information. * Mobile Device and OS type (Android or iOS) Behavioral information: * User's click stream on the Website or Dashboard/Editor or Service (i.e. the fact that User has chosen to click on a certain link or access a certain feature). * The activities of the User on the Website or Dashboard/Editor or Service, including information pertaining to activities made by the User (e.g., which action was taken on the Service, last login date etc.). * Any Similar behavioral information

and other aggregated statistics. Additionally, we may collect engagements related information and usage analytics including:

- Did the user finish the walkthrough?
- Did the user play / pause / close the walkthrough?
- Did the user reach a predefined goal (and which goal)?
- Per steps analytics
- Tracking conversion metrics
- Timestamps on all of the usage events
- Survey responses (Multiple choice, NPS, Free-text with the ability to reduce PII)
- Knowledge base, Chatbot and Voice Chatbot usage including positive and negative searches
- Curriculums progress
- Accessibility preferences – If applicable
- User's Preferred language
- Insights (non-UI engagements related analytics such as how many employees finished created a lead in a CRM regardless running a walkthrough)
- Non PII information (optional) such as browser type, OS type, user agent and more.

Important: This information is collected with respect to – 1. The Users of the Website and Customers who use the Service; and 2. Customer's end-users while they are using the Customer's online services. Such Non-personal Information is used for providing the Service and for anonymous analytics and statistics. It does not allow us to identify a Customer's end-user.

2. Personal Information. The other type of information is individually identifiable information ("Personal Information"). To put it simply, this information may identify an individual or is of a private and/or sensitive nature. Toonimo may collect following Personal Information of Users (including Customers) when opening a Service Account: contact information such as first and last name, organization name email, login and password. Toonimo Customers may also be requested to provide certain information for billing purposes. In any event, we will make our best efforts not to collect the Customer's end-user's Personal Information, nor attempt to contact them in any way. Any Personal Information (if at all) provided to us or collected by us will only be used for the purpose of providing the Service.

3. **How Do We Collect Information on Our Users?** * Non-personal Information: When you access or use the Website and/or Dashboard/Editor and/or Service we are aware of your usage of the Website and/or Dashboard/Editor and/or Service, and may gather, collect and record anonymously the information relating to such usage. * Personal Information: We only collect Personal Information that is voluntarily provided to us by a User (e.g., by Customers when they register to our Service, or by other Users who submit information to us). * Personal Information collected about Customer's end-users: As above stated, we do not collect or use Personal Information (other than IP Addresses which is optional), and we are not able to identify any such end-users unless explicitly requested by the Customer in writing which is typically done for the purpose of providing the Service.

4. **What are the Purposes of the Collection of Information?** * Non-personal Information is used for statistical and research purposes and for customization and improvement of the Website and Dashboard/Editor and Service. * Personal Information is collected in order to (a) offer support to our Users, (b) send our Users updates regarding our products or services, (c) determine the general location of our Users in order to provide the Service (including language adjustments, if needed), (d) end-users segmentation, (e) analyzing usage-based analytics (for content optimization, insights, etc.), (f) Dashboard/Editor access, (g) email/phone notifications to Dashboard/Editor users, (g) When applicable Email/phone communication with End-Users (for Email surveys etc.). (h) verify Account information, and (i) enable payments through Online Payment Processors. We do not collect sensitive payment information.

5. **Sharing Information with Third Parties** We will not share Personal Information with third parties, other than in the following cases: (a) to satisfy any applicable law, regulation, legal process, subpoena or governmental request; (b) to enforce the Terms (including this Privacy Policy), including investigation of potential violations thereof; (c) to detect, prevent, or otherwise address fraud, security or technical issues; (d) to respond to claims that any content published on the Website violates any right of a third-party; (e) to protect the rights, property, or personal safety of Toonimo, its users or the general public; (f) in the event we are undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of our assets; (g) to collect, hold and manage your Personal Information through a EEA based third party's cloud based services, as reasonable for business purposes, which may be located in countries outside of your jurisdiction but in the EEA (European Economic Area, as defined/referred to under the GDPR); (h) to allow our representatives/licensees/vendors/partners to operate the Website and/or Dashboard/Editor and/or Service. On first request, we shall provide the Customer with all information related to sub-processors listed in subpoint (g) and (h) as well as safeguards procedures in place to effectively protect personal information. For avoidance of doubt, we may use Non-personal Information as defined under Section 2.1 and transfer and disclose it to third parties at our own discretion.

6. **Claim related to, Deletion or Modification of Personal Information** If for any reason you (or any person) wish to delete or modify Personal Information, or if you have any other claim in relation with Personal Information, please send us an e-mail with adequate detail to: info@toonimo.com and we will modify or delete without delay any such Personal Information pursuant to any applicable privacy laws. Note that unless otherwise explicitly specified herein and/or unless you instruct us otherwise, we may retain your Personal Information for as long as reasonably required for the purposes of which such Personal Information was collected, all as permitted under any applicable privacy laws. Non-personal Information derived from your use of the Website or Dashboard/Editor or Service may remain on our servers indefinitely.

7. **Minors** The Website and Dashboard/Editor and Services are intended for Users over the age of eighteen (18). Therefore, we do not intend and do not knowingly collect Personal Information from children under this age. We reserve the right to request proof of age at any stage so that we can verify that minors under this age are not using our Site or Service.

8. **Cookies & Local Storage** When you access or use the Website and/or Dashboard/Editor and/or Service, we may use, upon your prior consent in accordance with European Union laws, industry-wide technologies such as "cookies" and Flash (or similar technologies), which stores certain information on your computer (collectively, **"Local Storage"**) and which will allow us to enable automatic activation of certain features, and make your experience much more convenient and effortless. Most browsers will allow you to erase Local Storage from your computer's hard drive, block acceptance of Local Storage, or receive a warning before a cookie is stored. If you block or erase Local Storage, or change the settings of Flash, your online experience may be limited. Local Storage usually stores Non-personal Information, such as the web pages you have visited, the duration of your browsing, etc.

9. **Security** We take a great care in maintaining the security of your information and in preventing unauthorized access to it through industry standard technologies and internal procedures. For this purpose, we shall implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, in a manner that ensures appropriate security of the personal data/Personal Information, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures ('integrity and confidentiality').

10. **Payments** In cases Payments are processed via Online Payment Processors, Their terms of use and privacy policies, not ours, govern your use of their services and should provide details about information they collect about you. It is your responsibility to abide by all the terms specified by these processors (including without limitation, any age restrictions or limitations with respect to payments) and your use of such services is at your own risk.

11. **Direct Marketing** You hereby refuse that we may use your contact details you provided us with (including, without limitation, e-mail address and phone number) for the purpose of providing you commercial and/or non-commercial materials related to our current and/or future products and services. You may provide your consent (which shall be presented in a manner which is clearly distinguishable from the other matters, in an intelligible and easily accessible form, using clear and plain language, in accordance with the GDPR) by sending a written notice to our e-mail address that appears in the Website or alternatively follow the instructions for allowing yourself in the mailing list which are available in the message transmitted to you.

12. **Third Party Service Providers** While using the Website, we may be using third party service providers, who may collect, store and/or process the Non-personal Information and – within the limits specified herein – Personal Information detailed herein. Toonimo engage with third parties that post a privacy policy governing their collection, processing and use of non-personal and personal information that respects the GDPR. Such software may include without limitation, Amazon & Oracle cloud services (and which may only process Personal Information for storage purposes) and Google Analytics whose privacy policy can be found at: http://www.google.com/intl/en/policies/privacy/ (which may not process Personal Information, but only Non-personal Information).

Please read such third-party service providers' terms of use and privacy policies to understand their privacy practices. The servers of our Third-Party Service Provider hosting the information detailed herein (including Personal Information) are located in

UK South (London);

Germany Central (Frankfurt);

Switzerland North (Zurich).

13. **Third Party Websites** While using the Website you may encounter links to third party websites. Please be advised that such third-party websites are independent from the Website, and we assume no responsibility or liability whatsoever with regard to privacy matters or any other legal matter with respect to such third-party websites. We encourage you to carefully read the privacy policies and the terms of use or Site of such websites.

14. **International Data Transfer** In order to provide the Website and Dashboard/Editor and Service, we may transfer information collected about you, including Personal Information, to affiliated entities, or to other third party service providers (as provided herein) across borders and from your country or jurisdiction to other countries or jurisdictions outside the European Economic Areas (EEA – as defined in the GDPR), in strict compliance of the GDPR and upon prior signature of all relevant documents as referred to in the GDPR..

15. **Changes to the Privacy Policy** The terms of this Privacy Policy will govern the use of the Website and/or Dashboard/Editor and/or Service, and any information collected therein. In case of any change to this Privacy Policy, we will notify you and ask for your written consent.

16. **Have any Questions?** If you have any questions (or comments) concerning this Privacy Policy, you are most welcomed to send us an email or otherwise contact us to the following address and we will make an effort to reply within a reasonable timeframe:

E-Mail:info@toonimo.com USA: +1-888-319-6572