



Privacy Policy

At **Goldfarb Seligman** (“**GS**” or “**We**”), we recognize that privacy is important. This privacy policy (“**Privacy Policy**”) describes the types of information we collect from you in the course of our business and services that we may provide to you (the “**Services**”), including from our website (the “**Website**”).

'Personally Identifiable Information' (“**PII**”) is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. During the course of our Services, you may provide PII to us, which will be processed subject to the terms of this Privacy Policy. Please read our Privacy Policy carefully to get a clear understanding of how We organize, collect, use, protect or otherwise handle your PII.

Please note that you are not legally required to provide PII. However, in order to provide our Services, We may require that you provide PII pursuant to this Privacy Policy. By engaging GS to provide Services to you, you consent to this Privacy Policy, inclusive of the terms described herein.

If you have any questions about this Privacy Policy, please feel free to contact us at: gs.web@goldfarb.com.

1. Information and How We Use It

GS may collect, process and use the data which includes PII, the legal basis of which is your consent, which you give when you engage our Services. Types of PII that may be used include the following, without limitation;

- 1.1. When engaging our Services, you may be asked to provide information for our KYC (Know Your Client) process or for our Services, such as your name, I.D., email address, telephone number, or other details (“**Entered Data**”). Such data may be processed for the purposes of providing our Services and communicating with you.
- 1.2. We may process information that you provide to use for the purpose of subscribing to our email notifications and/or newsletters (“**Notification Data**”) provided that you have specifically consented to receive the same. The Notification Data may be processed for the purposes of sending you relevant Notification Data.
- 1.3. We may process information contained in or relating to any communication that you send to us (“**Correspondence Data**”), for example, when you sign up for our newsletter or respond

to a survey. The Correspondence Data may include communication content and/or metadata associated with such communication. The Correspondence Data may be processed for communicating with you and record-keeping.

- 1.4. We may process any of the types of data described in this Section 1 if We are required to do so by court-order, any legal obligation to which We are subject, or when necessary, for the establishment, exercise or defense of legal claims. The legal basis for this processing is our legitimate interests, namely of GS legal rights, your legal rights and the legal rights of others.
- 1.5. We may process information that you provide us for the purpose of applying to a job at GS, such as name and contact details, educational background, employment background, job qualifications and work eligibility, including your place of residence, resume or transcripts, and any supporting documentation attached to your resume ("**Recruitment Data**"). The Recruitment Data may be processed for communicating with you and record-keeping.
- 1.6. Please do not supply any other person's PII to us without the specific and explicit consent of all parties, including the owner of such PII, unless required according to law.

2. Providing Your PII to Others

- 2.1. We may share the PII we collect with our service providers and subcontractors, such as our external archive service providers, who assist us in the storage and operation of data and provision of our Services and processing the information on our behalf and under our instructions, all in accordance with the terms of this Privacy Policy. We may also share certain PII (e.g., contact details) with business partners for the purpose of hosting or organizing marketing and public events.
- 2.2. We may share your PII with professional advisors insofar as reasonably necessary for the purposes of managing risks, obtaining professional advice and managing legal disputes.
- 2.3. We will only disclose your PII to third parties who provide sufficient guarantees that they implement appropriate technical and organizational measures in such a manner that their processing of your PII will meet the requirements under applicable law and pursuant to the Data Protection Regulation (as defined below) and ensure the protection of your rights and with whom We have agreements that conform to our legal obligations under applicable law and the Data Protection Regulation.

3. International Transfers of Your PII

- 3.1. In this Section 3, We provide information about the circumstances in which your PII may be transferred to countries worldwide including inside and outside the European Economic Area ("**EEA**").
- 3.2. We and our other group companies have facilities in Israel and Switzerland. "Adequacy decisions" of the European Commission have been made with respect to the data protection laws of Israel.
- 3.3. Transfers to countries will be protected by appropriate safeguards, namely the provisions of applicable law which relate to the protection of individuals with regards to the Processing of Personal Data to which a party may be subject including, without limitation, the Israeli Protection of Privacy Law, 5741-1981, the General Data Protection Regulation (EU) 2016/679, the Data Protection Act 1998, the Regulation of Investigatory Powers Act 2000, the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulation 2000, the Electronic Communications Data Protection Directive 2002/58/EC, the Privacy and Electronic Communications (EC Directive) Regulations 2003 and, where applicable, the guidance and code of practice issued by the Information Commissioner's Office from time to time, directions of any competent regulatory authority, relevant regulatory guidance and codes of practice (collectively "**Data Protection Regulation**") or to the extent transfers will cross borders to outside the EEA, such transfer shall be carried out in accordance with standard contractual clauses annexed to the EU Commission Decision 2010/87/EU of 5 February 2010 for the Transfer of Personal Data to Processors established in Third Countries under the Directive (the "**Model Clauses**") or any subsequent model clauses that will come into force and supersede the Model Clauses.
- 3.4. You acknowledge that PII submitted by you for the purpose of our Services may be transmitted around the world via the internet for the purpose of performing the Services and subject to the terms of this Privacy Policy.

4. Retaining and Deleting PII

- 4.1. This Section 4 sets out our data retention policies and procedures, which are designed to help ensure that We comply with our legal obligations in relation to the retention and deletion of PII.
- 4.2. We will retain and delete your PII as follows:

4.3. PII will be retained for up to a period following the end of the Services as may be required by law after which period it will be deleted from our systems.

4.4. Notwithstanding the other provisions of this Privacy Policy, We may retain your PII where such retention is necessary for compliance with a legal obligation to which We are subject, or in order to protect your vital interests or the vital interests of another natural person.

5. Your Rights

5.1. In this Section 5, We have done our best to summarize the rights that you may have under applicable data protection law. These are complex, and not all of the details have been included herein. In light of this, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

5.2. Your principal rights under data protection laws are all or some of the following:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

5.3. You have the right to confirmation as to whether or not We process your PII and, where We do, access to the PII, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of PII concerned and the recipients of the PII. Provided the rights and freedoms of others are not affected, and as requested or approved by you, We will supply to you a copy of your PII.

5.4. You have the right to have any inaccurate PII about you rectified and, taking into account the purposes of the processing, to have any incomplete PII about you completed.

5.5. In some circumstances you have the right to the erasure of your PII, by providing adequate evidence attesting to your identity, without undue delay. Those circumstances include: the PII is no longer necessary in relation to the purposes for which they were collected or otherwise

processed; you withdraw consent to consent-based processing; and the PII have been unlawfully processed. There are certain general exclusions of the right to erasure. Those general exclusions include where processing is necessary: for compliance with a legal obligation; or for the establishment, exercise or defense of legal claims.

- 5.6. In some circumstances you might have the right to restrict the processing of your PII. Those circumstances are (to the extent applicable under applicable Data Protection Regulation): you contest the accuracy of the PII; processing is unlawful but you oppose erasure; We no longer need the PII for the purposes of our processing, but you require PII for the establishment, exercise or defense of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, We may continue to store your PII. However, We will only otherwise process it: with your consent; for the establishment, exercise or defense of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 5.7. You might have the right to object to our processing of your PII on grounds relating to your particular situation (to the extent applicable under applicable Data Protection Regulation). If you make such an objection, We will cease to process the PII unless We can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defense of legal claims.
- 5.8. To the extent that the legal basis for our processing of your PII is consent, and such processing is carried out by automated means, you have the right to receive your PII from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 5.9. If you consider that our processing of your PII infringes Data Protection Regulations, you have a legal right to file a complaint with a supervisory authority responsible for data protection.
- 5.10. To the extent that the legal basis for our processing of your PII is consent you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 5.11. You may exercise any of your rights in relation to your PII by written notice to us in addition to the other methods specified in this Section 5.

6. Opt-in

When you provide us with PII for a secondary reason, like marketing or other secondary reasons which We will convey to you from time to time if applicable, We will ask for your consent. After you opt-in, you may withdraw your consent at any time, by contacting us at gs.web@goldfarb.com.

7. Children

We do not knowingly collect PII from children under the age of sixteen (16). In the event that you become aware of our collection of PII of an individual under the age of sixteen (16) who has used our Services without parental permission, please advise us immediately.

8. Information Security

- 8.1. We follow generally accepted industry standards to protect against unauthorized access to or unauthorized use, alteration, disclosure or destruction of PII. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while We strive to use commercially acceptable means to protect PII, We cannot guarantee its absolute security.
- 8.2. The PII is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required by contract to keep the information confidential.

9. Cookies

- 9.1. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that We can offer better site experiences and tools in the future.
- 9.2. Among other purposes, We use cookies to understand and save user's preferences for future visits.
- 9.3. You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since each browser

is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies.

9.4. If you turn cookies off, some of the features that make your site experience more efficient may not function properly.

9.5. We use the following types of cookies: Google Analytics.

9.6. We solely control the access to the cookie-related information.

9.7. Cookies will not be used for any purpose other than stated in this Privacy Policy.

10. Law and Jurisdiction

10.1. The law that applies to this Privacy Policy is the law of the State of Israel alone.

10.2. Exclusive jurisdiction to hear any dispute regarding the Website and/or the Privacy Policy and anything deriving thereunder is conferred to the competent court in the district of Tel Aviv-Jaffa, Israel.

11. Changes to the Privacy Policy

11.1. We may update this privacy Policy from time to time to keep it up to date with legal requirements and the way we operate our business, and we will place any updates on this webpage. Please come back to this page every now and then to make sure you are familiar with the latest version. If we make fundamental change to this Privacy Policy, we will seek to inform you by notice on our Website or per email.

11.2. If We are acquired or merged with another company, your information may be transferred to the new owners so that We may continue to provide our Services to you.

12. Contacting Us

If there are any questions regarding this Privacy Policy, you may contact us by using the information below: gs.web@goldfarb.com.

13. Last updated: July 2020