



## Privacy policy

**This notice explains how we process personal data. This notice may be amended or updated from time to time, so please check it regularly for updates.**

This notice is issued by each of the controller entities (together, “Yaqrit”, “we”, “us” and “our”) and is addressed to individuals outside our organisation with whom we interact, including patients, visitors to our sites, other users of our products or services, (personnel of corporate) customers, partners and vendors, applicants for employment, and visitors to our premises (together, “you”). Defined terms used in this notice are explained in below.

This notice may be amended or updated from time to time to reflect changes in our practices with respect to the processing of personal data, or changes in applicable law. Where necessary, we will inform you about any changes we might make in accordance with the terms of this notice.

This notice was last updated on 18th June 2025.

### Collection of personal data

We collect or obtain personal data: when those data are provided to us (e.g., where you contact us); in the course of our relationship with you (e.g., if you represent a Health Care Professional (HCP) or Health Care Organisation (HCO)); when you make personal data public (e.g., if you make a public post about us on social media); when you visit our sites; when you register to use any of our sites, products, or services; or when you interact with any third party content or advertising on a site. We may also receive personal data about you from third parties (e.g., law enforcement authorities).

**Collection of personal data:** We collect or obtain personal data about you from the following sources:

- Data provided to us: We obtain personal data when those data are provided to us (e.g., where you contact us *via* email or telephone, or by any other means, or when you provide us with your business card, or when you submit a job application, or when you provide information to our sales representatives).
- Data we obtain in person: We obtain personal data during meetings, during visits from sales or marketing representatives, or at events we attend.
- Collaborations: We obtain personal data when you collaborate with us in research or in an advisory/consultancy capacity.



- Relationship data: We collect or obtain personal data in the ordinary course of our relationship with you (e.g., we provide a service to you, or to your employer).
- Data you make public: We collect or obtain personal data that you manifestly choose to make public, including *via* social media (e.g., we may collect information from scientific publications, national registries, and your social media profile(s), if you make a public post about us).
- Site data: We collect or obtain personal data when you visit any of our sites or use any features or resources available on or through a site.
- Registration: We collect or obtain personal data when you use, or register to use, any of our sites, products, or services.
- Third-party databases: We collect or obtain personal data via third party databases we have contracts with.
- Content and advertising information: If you interact with any third-party content or advertising on a site (including cookies) we receive personal data from the relevant third-party provider of that content or advertising.
- Third party information: We collect or obtain personal data from third parties who provide it to us (e.g., credit reference agencies; law enforcement authorities; etc.).

### **Creation of person data**

We create personal data about you (e.g., records of your interactions with us).

We also create personal data about you in certain circumstances, such as records of your interactions with us, and details of your past interactions with us, as far as deletion periods do not contradict this procedure. We may also combine personal data from any of our sites, products, or services, including where those data are collected from different devices.

### **Categories of personal data we process**

We process: your personal details (e.g., your name); your contact details (e.g., your address); your professional details (e.g., your CV); records of surveys or testing in which you have participated; demographic data (e.g., your age); visitor logs for our premises; records of your consents; payment details (e.g., your billing address); information about our sites (e.g., the type of device you are using); details of your employer (where relevant); information about your interactions with our content or advertising; and any views or opinions you provide to us.

We process the following categories of personal data about you:

- Personal details: given name(s); preferred name; and photograph.

- Contact details: correspondence address; shipping address; telephone number; email address; details of personal assistants, where applicable.
- Professional details: your CV; records of your expertise; professional history; practising details and qualification details; information about your experience; participation in meetings, seminars, advisory boards and conferences; information about your professional relationship with other individuals or institutions; language abilities; and other professional skills.
- Demographic information: gender; date of birth / age; nationality; salutation; title; and language preferences.
- Visitor logs: records of visits to our premises.
- Consent records: records of any consents you have given, together with the date and time, means of consent, and any related information (e.g., the subject matter of the consent).
- Purchase details: records of purchases and prices; and consignee name, address, contact telephone number and email address.
- Payment details: invoice records; payment records; billing address; payment method; bank account number or credit card number; cardholder or account holder name; card or account security details; card 'valid from' date; card expiry date; BACS details; SWIFT details; IBAN details; payment amount; payment date; and records of cheques.
- Data relating to our Sites: device type; operating system; browser type; browser settings; IP address; language settings; dates and times of connecting to a Site; registration details; username; password; security login details; usage data; unique identifiers; access rights; and aggregate statistical information.
- Employer details: where you interact with us in your capacity as an employee of a third party; and the name, address, telephone number and email address of your employer, to the extent relevant.
- Content and advertising data: records of your interactions with our online advertising content, records of advertising and content displayed on pages displayed to you, and any interaction you may have had with such content or advertising (e.g., mouse hover, mouse clicks, any forms you complete in whole or in part) and any touchscreen interactions.
- Views, feedback, and opinions: any views, feedback, survey responses and opinions that you share with us or publicly post about.
- Product use details: when you report a possible adverse event, and/or a medical information query or quality complaint, associated with one of our products.

## **Sensitive personal data**

Where we need to process sensitive personal data for a legitimate purpose or in order to comply with our industry obligations, we do so in accordance with applicable law.

Where it becomes necessary to process your sensitive personal data for any reason, we rely on one of the following legal bases (as set out in Article 9 of the GDPR / UK GDPR):

1. You have given explicit consent to the processing of your sensitive personal data for one or more specified purposes, in accordance with applicable law;
2. Processing is necessary for the purposes of carrying out the obligations and exercising specific rights in the field of employment and social security and social protection law in so far as it is authorised by applicable law or a collective agreement pursuant to applicable law providing for appropriate safeguards for your fundamental rights and interests;
3. Processing is necessary to protect your vital interests or of another natural person where you are physically or legally incapable of giving consent;
4. Processing relates to personal data which you have manifestly made public;
5. Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;
6. Processing is necessary for reasons of substantial public interest, on the basis of applicable law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard your fundamental rights and interests;
7. Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of applicable law or pursuant to contract with a health professional and subject to the relevant conditions and safeguards provided in applicable law;
8. Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of applicable law which provides for suitable and specific measures to safeguard your rights and freedoms, in particular professional secrecy;
9. Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with applicable law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard your fundamental rights and interests.

## **Purpose of processing and legal bases for processing**



We process personal data for the following purposes: providing our sites, products, and services to you; compliance checks; operating our business; communicating with you; managing our IT systems; health and safety; financial management; conducting surveys; ensuring the security of our premises and systems; conducting investigations where necessary; compliance with applicable law; improving our sites, products, and services; fraud prevention; establishment, exercise and defence of legal claims; and recruitment and job applications

The purposes for which we process the categories of personal data subject to applicable law, and the legal bases on which we perform such processing, are as follows:

| Processing activity  | Legal basis for processing  | Categories of personal data   |
|--|---|---|
| <ul style="list-style-type: none"><li>• <u>Provision of sites, products, and services</u>: providing our sites, products, or services; providing promotional items upon request; and communicating with you in relation to those sites, products, or services.</li></ul> | <ul style="list-style-type: none"><li>• The processing is <b>necessary in connection with any contract</b> that you have entered into with us, or to take steps prior to entering into a contract with us; or</li><li>• We have <b>a legitimate interest</b> in carrying out the Processing for the purpose of providing our Sites, products, or services (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or</li><li>• We have obtained <b>your prior consent</b> to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is</li></ul> | <ul style="list-style-type: none"><li>• Personal details</li><li>• Contact details</li><li>• Demographic information</li><li>• Consent records</li><li>• Data relating to our Sites</li><li>• Content and advertising data</li><li>• Purchase details</li></ul> |

| Processing activity   | Legal basis for processing  | Categories of personal data   |
|---|---|---|
| <ul style="list-style-type: none"> <li>• <u>Compliance checks</u>: fulfilling our regulatory compliance obligations; 'Know Your Client' checks; and confirming and verifying your identity; use of credit reference agencies; and screening against government and/or law enforcement agency sanctions lists and other legal restrictions.</li> </ul> | <p>necessary or obligatory in any way).</p> <ul style="list-style-type: none"> <li>• The processing is necessary for <b>compliance with a legal obligation</b>; or</li> <li>• The processing is <b>necessary in connection with any contract</b> that you have entered into with us, or to take steps prior to entering into a contract with us; or</li> <li>• We have a <b>legitimate interest</b> in carrying out the Processing for the purpose of fulfilling our regulatory and compliance obligations (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or</li> <li>• We have obtained <b>your prior consent</b> to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).</li> </ul> | <ul style="list-style-type: none"> <li>• Personal details</li> <li>• Contact details</li> <li>• Professional details</li> <li>• Consent records</li> <li>• Payment details</li> <li>• Employer details</li> </ul> |
| <ul style="list-style-type: none"> <li>• <u>Operating our business</u>: operating and managing our Sites, our products, and our services; providing content to you; displaying advertising and other information to</li> </ul>  | <ul style="list-style-type: none"> <li>• The processing is <b>necessary in connection with any contract</b> that you have entered into with us, or to take steps</li> </ul>   | <ul style="list-style-type: none"> <li>• Personal details</li> <li>• Contact details</li> <li>• Consent records</li> </ul>  |

| Processing activity  | Legal basis for processing  | Categories of personal data  |
|--|---|--|
| <p>you; communicating and interacting with you <i>via</i> our Sites, our products, or our services; and notifying you of changes to any of our Sites, our products, or our services.</p>   | <p>prior to entering into a contract with us; or</p> <ul style="list-style-type: none"> <li>• We have <b>a legitimate interest</b> in carrying out the processing for the purpose of providing our Sites, our products, or our services to you (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or</li> <li>• We have obtained <b>your prior consent</b> to the processing (this legal basis is only used in relation to processing that is entirely voluntary – it is not used for processing that is necessary or obligatory in any way).</li> </ul> | <ul style="list-style-type: none"> <li>• Payment details</li> <li>• Data relating to our Sites</li> <li>• Content and advertising data</li> </ul>  |
| <ul style="list-style-type: none"> <li>• <u>Planning</u>: organisational planning; succession planning; making changes to the nature and scope of our operations or our business; mergers, acquisitions, dissolutions demergers, liquidations, asset sales, divestitures, reorganisations and similar corporate structuring arrangements.</li> </ul> | <ul style="list-style-type: none"> <li>• We have <b>a legitimate interest</b> in carrying out the processing for the purpose of planning the future operation of our operations or our business (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).</li> </ul>  | <ul style="list-style-type: none"> <li>• Personal details</li> <li>• Contact details</li> <li>• Professional details</li> <li>• Demographic information</li> <li>• Data relating to our Sites</li> <li>• Employer details</li> </ul> |

| Processing activity  | Legal basis for processing   | Categories of personal data  |
|--|--|--|
| <ul style="list-style-type: none"> <li>• <u>Communications and marketing</u>: communicating with you <i>via</i> any means (including <i>via</i> email, telephone, text message, social media, post or in person) to provide news items and other information in which you may be interested, subject always to obtaining your prior opt-in consent to the extent required under applicable law; personalising our Sites, products and services for you; maintaining and updating your contact information where appropriate; obtaining your prior, opt-in consent where required; enabling and recording your choice to opt-out or unsubscribe, where applicable.</li> </ul> | <ul style="list-style-type: none"> <li>• The processing is <b>necessary in connection with any contract</b> that you have entered into with us, or to take steps prior to entering into a contract with us; or</li> <li>• We have <b>a legitimate interest</b> in carrying out the processing for the purpose of contacting you, subject always to compliance with applicable law (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or</li> <li>• We have obtained <b>your prior consent</b> to the Processing (this legal basis is only used in relation to processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).</li> </ul> | <ul style="list-style-type: none"> <li>• Content and advertising data</li> <li>• Personal details</li> <li>• Contact details</li> <li>• Demographic information</li> <li>• Consent records</li> <li>• Data relating to our Sites</li> <li>• Content and advertising data</li> <li>• Views, feedback, and opinions</li> </ul> |
| <ul style="list-style-type: none"> <li>• <u>Product and patient safety / pharmacovigilance</u>: communications in relation to product safety, including product recalls, medical information enquiries, product quality complaints, conducting</li> </ul>  | <ul style="list-style-type: none"> <li>• The processing is necessary for <b>compliance with a legal obligation</b>; or</li> <li>• We have <b>a legitimate interest</b> in carrying out the</li> </ul>  | <ul style="list-style-type: none"> <li>• Personal details</li> <li>• Contact details</li> <li>• Payment details</li> <li>• Feedback</li> </ul>   |



| Processing activity  | Legal basis for processing  | Categories of personal data   |
|--|---|---|
| <p>clinical trials and product safety advisory notices.</p> <p>-</p>   | <p>processing for the purpose of ensuring the safety, and proper use, of our products (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms);</p> <ul style="list-style-type: none"> <li>• The processing is necessary to protect the <b>vital interests</b> of any individual;</li> <li>• The processing is <b>necessary in connection with any contract</b> that you have entered into with us, or to take steps prior to entering into a contract with us;</li> <li>• We have obtained <b>your prior consent</b> to the processing (this legal basis is only used in relation to processing that is entirely voluntary – it is not used for processing that is necessary or obligatory in any way).</li> <li>• The processing is necessary for <b>compliance with a legal obligation</b>; or</li> <li>• We have a <b>legitimate interest</b> in carrying out the processing for the purpose of managing and maintaining our communications and IT</li> </ul> | <ul style="list-style-type: none"> <li>• Interactions with our products</li> <li>• Product use details</li> </ul>   |
| <ul style="list-style-type: none"> <li>• <u>Management of IT systems</u>: management and operation of our communications, IT and security systems; and audits (including security audits) and monitoring of such systems.</li> </ul> |   | <ul style="list-style-type: none"> <li>• Personal details</li> <li>• Contact details</li> <li>• Professional details</li> <li>• Demographic information</li> <li>• Consent records</li> </ul> |

| Processing activity   | Legal basis for processing  | Categories of personal data   |
|---|---|---|
| <ul style="list-style-type: none"> <li>• <u>Health and safety</u>: health and safety assessments and record keeping; providing a safe and secure environment at our premises; and compliance with related legal obligations.</li> </ul> | <p>systems (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).</p> <ul style="list-style-type: none"> <li>• The processing is necessary for <b>compliance with a legal obligation</b>; or</li> <li>• We have a <b>legitimate interest</b> in carrying out the processing for the purpose of ensuring a safe environment at our premises (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or</li> <li>• The processing is necessary to protect the <b>vital interests</b> of any individual.</li> </ul> | <ul style="list-style-type: none"> <li>• Data relating to our Sites</li> <li>• Employer details</li> <li>• Content and advertising data</li> <li>• Personal details</li> <li>• Contact details</li> <li>• Visitor logs</li> </ul> |
| <ul style="list-style-type: none"> <li>• <u>Financial management</u>: sales; finance; corporate audit; and vendor management.</li> </ul>  | <ul style="list-style-type: none"> <li>• We have a <b>legitimate interest</b> in carrying out the processing for the purpose of managing and operating the financial affairs of our business (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or</li> </ul>  | <ul style="list-style-type: none"> <li>• Personal details</li> <li>• Contact details</li> <li>• Payment details</li> </ul>  |

| Processing activity  | Legal basis for processing   | Categories of personal data   |
|--|--|---|
| <ul style="list-style-type: none"> <li>• <u>Surveys and research</u>: engaging with you for the purposes of obtaining your views on our Sites, our products, or our services.</li> </ul>   | <ul style="list-style-type: none"> <li>• We have obtained <b>your prior consent</b> to the processing (this legal basis is only used in relation to processing that is entirely voluntary – it is not used for processing that is necessary or obligatory in any way).</li> <li>• We have <b>a legitimate interest</b> in carrying out the processing for the purpose of conducting surveys, satisfaction reports and market research (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or</li> <li>• We have obtained <b>your prior consent</b> to the processing (this legal basis is only used in relation to processing that is entirely voluntary – it is not used for processing that is necessary or obligatory in any way).</li> </ul> | <ul style="list-style-type: none"> <li>• Personal details</li> <li>• Consent records</li> <li>• Views, feedback, and opinions</li> </ul>                |
| <ul style="list-style-type: none"> <li>• <u>Security</u>: physical security of our premises (including records of visits to our premises); CCTV recordings; and electronic security (including login records and access details).</li> </ul> | <ul style="list-style-type: none"> <li>• The processing is necessary for <b>compliance with a legal obligation</b>; or</li> <li>• We have <b>a legitimate interest</b> in carrying out the processing for the purpose of ensuring the physical and</li> </ul>  | <ul style="list-style-type: none"> <li>• Personal details</li> <li>• Contact details</li> <li>• Professional details</li> <li>• Visitor logs</li> </ul> |

| Processing activity  | Legal basis for processing  | Categories of personal data   |
|--|---|---|
| <ul style="list-style-type: none"> <li>• <u>Investigations</u>: detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law.</li> </ul> | <p>electronic security of our business and our premises (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).</p> <ul style="list-style-type: none"> <li>• The processing is necessary for <b>compliance with a legal obligation</b>; or</li> <li>• We have a <b>legitimate interest</b> in carrying out the processing for the purpose of detecting, and protecting against, breaches of our policies and applicable laws (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).</li> </ul> | <ul style="list-style-type: none"> <li>• Personal details</li> <li>• Contact details</li> <li>• Professional details</li> <li>• Visitor logs</li> <li>• Payment details</li> <li>• Data relating to our Sites</li> <li>• Employer details</li> </ul>  |
| <ul style="list-style-type: none"> <li>• <u>Legal compliance</u>: compliance with our legal and regulatory obligations under applicable law.</li> </ul>  | <ul style="list-style-type: none"> <li>• The processing is <b>necessary for compliance with a legal obligation</b>.</li> </ul>  | <ul style="list-style-type: none"> <li>• Personal details</li> <li>• Contact details</li> <li>• Professional details</li> <li>• Visitor logs</li> <li>• Payment details</li> <li>• Data relating to our Sites</li> <li>• Employer details</li> <li>• Personal details</li> <li>• Contact details</li> </ul> |
| <ul style="list-style-type: none"> <li>• <u>Improving our sites, products, and services</u>: identifying issues with our Sites, our products, or our services;</li> </ul>                        | <ul style="list-style-type: none"> <li>• We have a <b>legitimate interest</b> in carrying out the processing for the purpose of</li> </ul>  | <ul style="list-style-type: none"> <li>• Personal details</li> <li>• Contact details</li> </ul>   |

| Processing activity  | Legal basis for processing   | Categories of personal data  |
|--|--|--|
| <p>planning improvements to our sites, our products, or our services; and creating new sites, products, or services.</p>   | <p>improving our sites, our products, or our services (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or</p> <ul style="list-style-type: none"> <li>• We have obtained <b>your prior consent</b> to the processing (this legal basis is only used in relation to processing that is entirely voluntary – it is not used for processing that is necessary or obligatory in any way).</li> <li>• The processing is necessary for <b>compliance with a legal obligation</b> (especially in respect of applicable employment law); or</li> <li>• We have a <b>legitimate interest</b> in carrying out the processing for the purpose of detecting, and protecting against, fraud (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).</li> <li>• The processing is necessary for <b>compliance with a legal obligation</b>; or</li> <li>• We have a <b>legitimate interest</b> in carrying out the</li> </ul> | <ul style="list-style-type: none"> <li>• Survey and testing data</li> <li>• Demographic information</li> <li>• Consent records</li> <li>• Data relating to our Sites</li> <li>• Content and advertising data</li> <li>• Personal details</li> <li>• Contact details</li> <li>• Professional details</li> <li>• Visitor logs</li> <li>• Payment details</li> <li>• Data relating to our Sites</li> <li>• Employer details</li> <li>• Personal details</li> <li>• Contact details</li> <li>• Professional details</li> </ul> |
| <ul style="list-style-type: none"> <li>• <u>Fraud prevention</u>: Detecting, preventing and investigating fraud.</li> <li>• <u>Establishment, exercise and defence of legal claims</u>: management of legal claims; establishment of facts and claims, including collection, review and</li> </ul> |  |  |

### Processing activity

production of documents, facts, evidence and witness statements; exercise and defence of legal rights and claims, including formal legal proceedings.

- Recruitment and job applications: recruitment activities; advertising of positions; interview activities; analysis of suitability for the relevant position; records of hiring decisions; offer details; and acceptance details.

### Legal basis for processing

processing for the purpose of establishing, exercising or defending our legal rights (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or

- The processing is necessary for **the establishment, exercise or defence of legal claims**.

- The processing is necessary for **compliance with a legal obligation** (especially in respect of applicable employment law); or

- We have **a legitimate interest** in carrying out the processing for the purpose of recruitment activities and handling job applications (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained **your prior consent** to the processing (this legal basis is only used in relation to processing that is

### Categories of personal data

- Demographic information
- Visitor logs
- Consent records
- Payment details
- Data relating to our Sites
- Employer details
- Content and advertising data
- Views, feedback, and opinions
- Personal details
- Contact details
- Professional details
- Demographic information
- Visitor logs
- Consent records
- Payment details
- Data relating to our Sites
- Employer details
- Content and advertising data



| Processing activity | Legal basis for processing  | Categories of personal data     |
|---------------------|---|---------------------------------|
|                     | entirely voluntary – it is not used for processing that is necessary or obligatory in any way). | • Views, feedback, and opinions |

### Disclosure of personal data to third parties

We disclose personal data to: legal and regulatory authorities; our external advisors; our processors; any party as necessary in connection with legal proceedings; any party as necessary for investigating, detecting or preventing criminal offences; and any purchaser of our business; and any third party providers of advertising or content used on our sites.

We disclose personal data to other entities within the Yaqrit group and to our business partners (licensing partners and distributors), for legitimate business purposes and the operation of our sites, products, or services to you, in accordance with applicable law. In addition, we disclose personal data to:

- you and, where appropriate, your appointed representatives;
- legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- accountants, auditors, consultants, lawyers and other outside professional advisors to Yaqrit subject to binding contractual obligations of confidentiality;
- third party processors (such as clinical trial-related service providers; payment services providers; shipping companies; Web service providers etc., e.g. Amazon Web Services, Google Analytics, Microsoft Azure), located anywhere in the world;
- any relevant party, regulatory body, governmental authority, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal claims;
- any relevant party, regulatory body, governmental authority, law enforcement agency or court, for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties;
- any relevant third-party acquirer(s) or successor(s) in title, in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation); and
- any relevant third-party provider, where our sites use third party advertising or content. If you choose to interact with any such advertising or content, your personal data may be shared with the relevant third-party provider.



We recommend that you review that third party's privacy policy before interacting with its advertising or content.

If we engage a third-party processor to process your personal data, the processor will be subject to binding contractual obligations to: (i) only process the personal data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the personal data; together with any additional requirements under applicable law.

### **International transfers of personal data**

We transfer personal data to data processors, joint data controllers and recipients in other countries. Where we transfer personal data from the UK or the EEA to a recipient outside the UK or the EEA (as applicable) that is not in an adequate jurisdiction, we do so on the basis of standard contractual clauses or the UK equivalent (i.e., the UK International Data Transfer Agreement / UK addendum to the Standard Contractual Clauses).

Because of the international nature of our business, we transfer personal data within the Yaqrit group, and to third parties in connection with the purposes set out in this notice. For this reason, we transfer personal data to other countries that may have different laws and data protection compliance requirements to those that apply in the country in which you are located. For example, we could transfer your data to European Member States (Austria, Germany, France, Belgium, Spain, Italy, Portugal, the Netherlands, Finland, Sweden), countries in the EEA (e.g. Norway, Switzerland), as well as countries outside the EEA that do not provide an adequate level of protection for your personal data (e.g. India). Non-EU countries include the United States, India, Australia and New Zealand.

If an exemption or derogation applies (e.g., where a transfer is necessary to establish, exercise or defend a legal claim) we may rely on that exemption or derogation, as appropriate. Where no exemption or derogation applies, and we transfer your personal data from the UK or the EEA to recipients located outside the UK or the EEA (as applicable) who are not in adequate jurisdictions, we do so on the basis of the latest valid version of the European Commission's Standard Contractual Clauses or the UK equivalent (i.e., the UK International Data Transfer Agreement / UK addendum to the Standard Contractual Clauses), as applicable.





### **Data security**

The security of your personal data is of paramount importance to us. As such, we strive to implement the most appropriate and state-of-the-art technical and organisational security measures to protect your personal data against breaches of confidentiality, integrity and availability.

We have implemented appropriate technical and organisational security measures (such as end-to-end encryption, pen testing, incident response management, malware alerts and remediation actions) designed to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of processing, in accordance with applicable law.

Because the internet is an open system, the transmission of information *via* the internet is not completely secure. Although we will implement all reasonable measures to protect your personal data, we cannot guarantee the security of your data transmitted to us using the “open” internet. As such, any such transmission via the open channels of the Internet is at your own risk and you are responsible for ensuring that any personal data that you send to us are sent securely. It is recommended that if there is the risk identified to the transmission of data, protective measures such as encryption are used in line with commonly used methods.

### **Data accuracy**

We take every reasonable step to ensure that your personal data are kept accurate and up-to-date and are erased or rectified if we become aware of inaccuracies or if you bring them to our attention.

We take every reasonable step to ensure that:

- your personal data that we process are accurate and, where necessary, kept up to date; and
- any of your personal data that we process that are inaccurate (having regard to the purposes for which they are processed) are erased or rectified without delay.

From time to time, we may ask you to confirm the accuracy of your personal data.

### **Data retention**

We take every reasonable step to ensure that your Personal Data are only retained for as long as they are needed in connection with a lawful purpose.

## **Your legal rights**

Subject to applicable law, you may have a number of rights, including: the right not to provide your personal data to us; the right of access to your personal data; the right to request rectification of inaccuracies; the right to request the erasure, or restriction of processing, of your personal data; the right to object to the processing of your personal data; the right to have your personal data transferred to another controller; the right to withdraw consent; and the right to lodge complaints with data protection authorities. In some cases, it will be necessary to provide evidence of your identity before we can give effect to these rights.

Subject to applicable law, you may have the following rights regarding the processing of your relevant personal data:

- the right not to provide your personal data to us (however, please note that we will be unable to provide you with the full benefit of our sites, products, or services, if you do not provide us with your personal data – e.g., we might not be able to process your requests without the necessary details);
- the right to request access to, or copies of, your relevant personal data, together with information regarding the nature, processing and disclosure of those relevant personal data;
- the right to request rectification of any inaccuracies in your relevant personal data;
- the right to request, on legitimate grounds:
  - erasure of your relevant personal data; or
  - restriction of processing of your relevant personal data;
- the right to have certain relevant personal data transferred to another controller, in a structured, commonly used and machine-readable format, to the extent applicable;
- where we process your relevant personal data on the basis of your consent, the right to withdraw that consent (noting that such withdrawal does not affect the lawfulness of any processing performed prior to the date on which we receive notice of such withdrawal, and does not prevent the processing of your personal data in reliance upon any other available legal bases); and
- the right to lodge complaints regarding the processing of your relevant personal data with a data protection authority (i.e., in relation to the UK, the Information Commissioner's Office (<https://ico.org.uk/>) or in relation to the EU, the Data Protection Authority for EU Member State in which you live, or in which you work, or in which the alleged infringement occurred (see the list here: [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en))).

Subject to applicable law, you may also have the following additional rights regarding the processing of your relevant personal data:



- The right to object, on grounds relating to your particular situation, to the processing of your relevant personal data by us or on our behalf, where such processing is based on Articles 6(1)(e) (public interest) or 6(1)(f) (legitimate interests) of the GDPR / UK
- The right to object to the Processing of your Relevant Personal Data by us or on our behalf for direct marketing purposes

This does not affect your statutory rights.

To exercise one or more of these rights, or to ask a question about these rights or any other provision of this notice, or about our processing of your personal data.

Please note that:

- in some cases, it will be necessary to provide evidence of your identity before we can give effect to these rights; and
- where your request requires the establishment of additional facts (e.g., a determination of whether any processing is non-compliant with applicable law) we will investigate your request reasonably promptly, before deciding what action to take.

### **Cookies and similar technologies**

We process personal data by using cookies and similar technologies. For more information, please see our cookie policy on the relevant Site you are visiting.

When you visit a site, we will typically place cookies onto your device, or read cookies already on your device, subject always to obtaining your consent, where required, in accordance with applicable law. We use cookies to record information about your device, your browser and, in some cases, your preferences and browsing habits. We process personal data through cookies and similar technologies, in accordance with our cookie policies.

### **Terms of use**

Our terms of use govern all use of our sites, and our services.

All use of our sites, products, or services is subject to our terms of use. We recommend that you review our terms of use regularly, in order to review any changes, we might make from time to time.

### **Direct marketing**



We process personal data to contact you with information about sites, products, or services that may be of interest to you. You may unsubscribe to these communications at any time.

We process personal data to contact you *via* email, telephone, direct mail or other communication formats to provide you with information regarding sites, products, or services that may be of interest to you. We also process personal data for the purposes of displaying content tailored to your use of our sites, products, or services. If we provide sites, products, or services to you, we may send or display information to you regarding our sites, products, or services, upcoming promotions and other information that may be of interest to you, including by using the contact details that you have provided to us, or any other appropriate means, subject always to obtaining your prior opt-in consent to the extent required under applicable law.

You may unsubscribe from our promotional email list at any time by simply clicking on the unsubscribe link included in every promotional electronic communication we send. Please note that it may take up to 4 weeks to process your unsubscribe request during which time you may continue to receive communications from us. After you unsubscribe, we will not send you further promotional emails, but in some circumstances, we will continue to contact you to the extent necessary for the purposes of any sites, products, or services you have requested.



## Cookie policy

Last updated 20<sup>th</sup> June 2025

### What are cookies?

Cookies are small data files that websites download to a user's computer, phone or tablet. Most web browsers automatically accept cookies. They help website providers, for example, to recognise a user that has visited a website previously. Further details on the cookies used on this website and their purposes are set out below:

- You navigate the website in the easiest way possible
- Assisting in registering for our event, login and your ability to provide feedback
- Analysing site usage (how many users visited a specific page for instance)
- Analysing the use of our products, services and / or applications
- Assisting with our promotional and marketing efforts (including behavioural advertising)
- Offering content of third parties (such as social media content)

Detailed information about each cookie can be found in the appropriate cookie category section of the banner as well as in the section below.

### Cookie category description

#### Strictly necessary cookies

The strictly necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. These cookies are necessary for the 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 may be able to decline these cookies through your browser, but necessary parts of the site will not then work. These cookies do not store any personally identifiable information.

#### Functional cookies

These cookies enable the website to provide enhanced functionality and personalization. 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 cookies

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site.

#### Marketing cookies



These cookies are used to track our visitors' browsing habits. They can be used to build up a profile of search and/or browsing history for every visitor. Identifiable or unique data is collected to show relevant/personalized marketing content to each user. The information that uniquely identifies users' browsers and internet devices is used to display targeted advertising and/or share this data with third parties for the same purpose.

**Refusing cookies**

You do not have to accept cookies, but without accepting them you may experience reduced Site functionality. You can manage your preferences regarding cookies and other tracking technologies and revoke your consent in the banner. You can withdraw your consent at any time. If you would like more information about deleting, disabling and blocking cookies, please visit the website: <https://knowcookies.com> and check the "manage cookies" and "webmasters guide" sections.

**Updating our cookie policy**

There is a possibility that we will update our cookie policy on this website in accordance with legal and technical requirements, therefore we recommend that you read this policy occasionally so that you are adequately informed about how and for what we use cookies.

**Contact**

If you have any questions about this Cookie Policy or the collection, processing and disclosure of your personal data and your data protection rights, please see our privacy policy.