

**Bermad**  
**Products Privacy Notice**

## Introduction

We, at Bermad CS Ltd. (the “**Company**”, “**we**”, “**us**”, “**our**”), are the controller throughout the entire Bermad group of companies regarding this privacy policy. We respect the privacy and data protection rights of those who use our products (“**Products**”). This Privacy Notice (the “**Notice**”) describes the personal information we have and the policies and procedures we use regarding personal information collected and processed when you use the Products (a “**User**”).

This Notice may be amended from time to time. We will post any change to this Notice on our Website a reasonable time in advance of the effective date of the change, and we will also make efforts to proactively notify you by email of the changes to the Notice if we have your email address.

## Contact us

If you have any questions, comments, or concerns regarding this Notice or our processing of your personal information, please contact us at [support@bermad.com](mailto:support@bermad.com).

## What we collect and why

Scenario	Purposes	Categories of information processed
You register to use our Products	Operating the Product and providing its features and functions to you.  Contacting you with administrative messages about the Product.	Name, Phone number, email address and time zone.
We contact you with marketing offers	Our business development	Phone number email address
You use the Product	Operating the Product and providing its features and functions to you, as well as technical support.	The precise location of the unit you installed, and information collected from the sensors such as pressure, temperature, humidity, etc.
You use the Product	Understanding how you use the Product so that we can consider how to improve and enhance it and other Products.	Analytics information, such as the user-interface clicks you’ve engaged in on the Product, the time and date you last used the Product, as well as an indication of which content and user-notifications you viewed on the Product.
You pay the fees to use the Product	Billing you for the fees that apply to your use of the Product	Name, payment method, billing address, and fee charged.  We are not exposed to your credit card number and do not keep that number. Your credit card information is handled securely by a separate payment processor.
If you abused their rights to use the Product, or violated any applicable law while doing business with us	Responding to, handling, and mitigating suspected violations of law in connection with our business	Any of the information mentioned above

## Methods and sources for collecting your personal information

We collect the personal information from several sources:

- Directly from you as when you provide it to us through the registration form. You are not legally obligated to provide your personal information, but if you do not, you will not be able to use the Product or receive technical support from us.
- From the device you use to access the Product.

## Sharing your personal information

We will not share your information with third parties, except in the events listed below or when you provide us your explicit and informed consent. We do not sell your personal information to third parties.

Scenario	Purposes	Examples of Third parties involved
We will share your personal information with our service providers who assist us with the internal operations of our business and the Product. These companies are authorized to use your personal information in this context only as necessary to provide these services to us and not for their own promotional purposes.	Operating the Product and our business	Web hosting provider, payment processing provider
If you abused your rights to use the Website or violated any applicable law in the course of doing business with us.	Responding to, handling, and mitigating suspected violations of law in connection with our business.	Competent authorities, legal counsels, and advisors.
If a judicial, governmental, or regulatory authority requires us to disclose your information.	Complying with a binding request from a competent authority.	Competent authorities.
If the operation of the Product or our business is organized within a different framework, or through another legal structure or entity (such as due to a merger or acquisition).	Enabling a structural change in the operation of the Website and our business.	The target entity of the merger or acquisition, legal counsels, and advisors.

## Data retention and security

**We retain your information for the duration we need it to operate the Product, our business, and interact with customers, partners, and suppliers, and thereafter as needed for record-keeping matters.**

We will retain your information for the duration needed to support our ordinary business activities operating the Product and interacting with you as a User. Thereafter, we will still retain your personal information as necessary to comply with our legal obligations, resolve disputes, establish, and defend legal claims and enforce our agreements. The overall period of retention is approximately 7 years.

### **We implement measures to secure your information**

We implement measures to reduce the risks of damage, loss of information and unauthorized access or use of information. However, these measures do not provide absolute information security. Therefore, although efforts are made to secure your personal information, there is no guarantee that it will be immune from information security risks.

## Additional information for individuals in the EU or UK

### **Controller and GDPR representative**

Name	Address	EU GDPR Representative	UK GDPR Representative
<b>Bermad CS Ltd.</b>	Kibbutz Evron, postal code 2280800, Israel	Bermad Europe S.L. If you are within the European Economic Area, you may contact our European representative the at the following address Calle Comercio, 1 – Nave 22, 08780 Pallejà, Barcelona, Spain.	Bermad UK Ltd. If you are within the UK, you may contact our UK representative the at the following address: Unit 8 Hungerford Trading Estate, Hungerford Berkshire, RG17 0QU, England, United Kingdom

### International data transfers

To facilitate processing your information within the companies in our corporate group and by our service providers, we will transfer your information to countries such as the United States. We do so under the terms of a data transfer agreement which contain standard data protection contract clauses with adequate safeguards determined by the EU Commission.

### Legal basis for processing your personal data

Purpose or Scenario	Legal Basis
<b>Operating the Product and contacting you with administrative messages about the Product</b> <b>Billing you for the fees that apply to your use of the Product</b>	Legitimate interests in administering the operation of the Product and providing the Product’s features to you
<b>Contacting you with marketing offers</b>	Your express consent
<b>Understanding how you use the Product so that we can consider how to improve and enhance it and other Products (analytics information)</b>	Legitimate interests in our business development
<b>Responding to, handling, and mitigating suspected violations of law in connection with our business</b>	Legitimate interests in defending and enforcing against violations and breaches that are harmful to our business
<b>Complying with a binding request from a competent authority</b>	Legitimate interests in complying with mandatory legal requirements imposed on us
<b>Enabling a structural change in the operation of the Website and our business</b>	Legitimate interests in our business continuity

### Data subject rights

If you are in the EU or the UK, you have the following rights under the GDPR:

**Right to Access** and receive a copy of your personal information that we process.

**Right to withdraw consent** to use your personal data to send you marketing messages.

**Right to Rectify** inaccurate personal information we have concerning you and to have incomplete personal information completed.

**Right to Data Portability**, that is, to receive the personal information that you provided to us, in a structured, commonly used, and machine-readable format. You have the right to transmit this data to another person or entity. Where technically feasible, you have the right to have your personal information transmitted directly from us to the person or entity you designate.

**Right to Object** to our processing of your personal information based on our legitimate interest. However, we may override the objection if we demonstrate compelling legitimate grounds, or if we need to process such personal information for the establishment, exercise, or defense of legal claims.

**Right to Restrict** us from processing your personal information (except for storing it): (a) if you contest the accuracy of the personal information (in which case the restriction applies only for a period enabling

us to determine the accuracy of the personal information); (b) if the processing is unlawful and you prefer to restrict the processing of the personal information rather than requiring the deletion of such data by us; (c) if we no longer need the personal information for the purposes outlined in this Notice, but you require the personal information to establish, exercise or defend legal claims; or (d) if you object to our processing based on our legitimate interest (in which case the restriction applies only for the period enabling us to determine whether our legitimate grounds for processing override yours).

**Right to be Forgotten.** Under certain circumstances, such as when you object to our processing of your personal information based on our legitimate interest and there are no overriding legitimate grounds for the processing, you have the right to ask us to erase your personal information. However, notwithstanding such request, we may still process your personal information if it is necessary to comply with our legal obligations, or for the establishment, exercise, or defense of legal claims. If you wish to exercise any of these rights, please contact us through the channels listed in this Notice.

When you contact us, we reserve the right to ask for reasonable evidence to verify your identity before we provide you with information. Where we are not able to provide you with information that you have asked for, we will explain the reason.

Subject to applicable law, you have the right to lodge a complaint with your local data protection authority. If you are in the EU, then according to Article 77 of the GDPR, you can lodge a complaint to the supervisory authority, in the Member State of your residence, place of work or place of alleged infringement of the GDPR. For a list of supervisory authorities in the EU, click [here](#).

If you are in the UK, you can lodge a complaint to the Information Commissioner’s Office (ICO) pursuant to the instructions provided [here](#).

## Additional information for individuals in the United States

If you are an individual residing in the United States, we provide you with the following information pursuant to the California Privacy Rights Act (CPRA) and other state privacy laws in the U.S. This is also the information we have collected in the past 12 months.

We do not sell your personal information and have not done so in the past 12 months.

We also do not share your personal information for online behavioral-targeted ads and have not done so in the past 12 months.

We do not use or disclose sensitive personal information.

Categories of personal information	Specific types of personal information collected	Specific business or commercial purpose for collecting personal information from consumers
<b>Identifiers</b>	Email address, phone number	<ul style="list-style-type: none"> <li>• Business development</li> <li>• Administering the business and professional services relationship with customers and facilitating the provision of support to customers</li> <li>• Facilitating the provision of the Product and support for the Product</li> <li>• Responding to, handling, and mitigating suspected violations of law in connection with our business</li> </ul>
<b>Other information that identifies, relates to, describes, or is capable of being associated with, the individual</b>	Time zone	
<b>Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies</b>	The precise location of the unit you installed, and information collected from the sensors such as pressure, temperature, humidity, etc.	

<b>Internet or other electronic network activity information</b>	Analytics information, such as the user-interface clicks you've engaged in on the Product, the time and date you last used the Product, as well as an indication of which content and user-notifications you viewed on the Product	
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**Disclosing your information to third parties**

The chart below explains about the personal information we disclosed for a business purpose to third parties in the preceding 12 months.

<b>Categories of personal information</b>	<b>Categories of third parties to whom we disclose your information and the specific business or commercial purpose for the disclosure</b>
<b>Identifiers</b>	<ul style="list-style-type: none"> <li>• With outside legal counsels and authorities, for the purpose of responding to, handling, and mitigating suspected violations of law in connection with our business.</li> <li>• With third parties to which a law or binding order requires us to disclose your information to. Our purpose in doing so complying with our obligations under the law or the binding order.</li> <li>• With the target entity of our merger, acquisition or reorganization, and legal counsels, and advisors, for the purpose of facilitating the structural change in the operation of our business within a different framework, or through another legal structure or entity (such as due to a merger or acquisition).</li> </ul>
<b>Other information that identifies, relates to, describes, or is capable of being associated with, the individual</b>	
<b>Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies</b>	
<b>Internet or other electronic network activity information</b>	

**Your rights if you are a resident of California or other states in the U.S.**

**Knowing the personal information we collect about you**

You have the right to know:

- The categories of personal information we have collected about you.
- The categories of sources from which the personal information is collected.
- Our business or commercial purpose for collecting personal information.
- The categories of third parties with whom we share personal information, if any.
- The specific pieces of personal information we have collected about you.

**Right to deletion**

Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:

- Delete your personal information from our records; and
- Direct any service providers to delete your personal information from their records.

Please note that we may not delete your personal information if it is necessary to:

- Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us.

- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act.
- Engage in public or peer-reviewed scientific, historical, or statistical research that conforms or adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the ability to complete such research, provided we have obtained your informed consent.
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us and compatible with the context in which you provided the information.  
or
- Comply with an existing legal obligation.

We also will deny your request to delete if it proves impossible or involves disproportionate effort, or if another exception to the privacy laws applies. We will provide you a detailed explanation that includes enough facts to give you a meaningful understanding as to why we cannot comply with the request to delete your information.

### **Right to correct inaccurate personal information**

If we receive a verifiable request from you to correct your information and we determined the accuracy of the corrected information you provide, we will correct inaccurate personal information that we maintain about you.

In determining the accuracy of the personal information that is the subject of your request to correct, we will consider the totality of the circumstances relating to the contested personal information.

We also may require that you provide documentation if we believe it is necessary to rebut our own documentation that the personal information is accurate.

We may deny your request to correct in the following cases:

- We have a good-faith, reasonable, and documented belief that your request to correct is fraudulent or abusive.
- We determine that the contested personal information is more likely than not accurate based on the totality of the circumstances.
- Conflict with federal or state law.
- Other exception to the privacy laws.
- Inadequacy in the required documentation
- Compliance proves impossible or involves disproportionate effort.

We will provide you a detailed explanation that includes enough facts to give you a meaningful understanding as to why we cannot comply with the request to correct your information.

### **Protection against discrimination**

You have the right to not be discriminated against by us because you exercised any of your rights.

### **Exercising your rights**

If you would like to exercise any of your rights as described in this Notice, please contact us by e-mail at [support@bermad.com](mailto:support@bermad.com).

We will ask you for additional information to confirm your identity and for security purposes, before disclosing the personal data requested to you, by using a two or three points of data verification process, depending on the type of information you require and the nature of your request.

You may also designate an authorized agent to make a request on your behalf. To do so, you need to provide the authorized agent written permission to do so and the agent will need to submit to us proof that they have been authorized by you. We will also require that you verify your own identity, as explained below.

### **Disclosures to third parties**

California Civil Code Section 1798.83 (and other, similar state statutes) permits our customers who are California

residents (or residents of states with similar legislation) to request certain information regarding our disclosure of Personal Data to third parties for their direct marketing purposes. To make such a request, please send an email to [support@bermad.com](mailto:support@bermad.com). Please note that we are only required to respond to one request per customer each year.