

IRON NATION WEBSITE PRIVACY POLICY

Last Updated: November 1, 2023

In order to ensure transparency and give you more control over your personal data, this privacy policy (“**Privacy Policy**”) governs how we, Iron Nation Ltd. and its affiliates (“**Iron Nation**”, “**we**”, “**us**”) use, collect and store personal data that we collect or receive from or about you (“**you**”) in connection with <https://www.ironnation.org/> (the “**Website**”) and the services provided therein (the “**Services**”).

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to personal data. **Important note:** Nothing in this Privacy Policy is intended to limit in any way your statutory rights, including your rights to a remedy or other means of enforcement.

Iron Nation is a volunteer emergency impact fund with the mission of ensuring the continuity of early-stage Israeli start-ups.

This Privacy Policy may be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy. If we implement material changes in the way we use your information, in a manner that is different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means and take any additional steps as required by applicable law.

1. WHAT PERSONAL DATA WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

(i) We Process the Following Personal Data:

- a. **Information provided through the Website forms whether you are a donor or an investor.** We collect and process the information you provide us with, when you fill out forms on the Website, such as when you invest in Israeli startups or make a donation to Israeli startups.
- b. **Information provided through the Website forms as a startup.** We collect and process the information that you provide us with, when you fill out forms on the Website, such as when you register your Israeli startups.
- c. **Information automatically collected.** We may automatically collect certain information through your use of Iron Nation's Website, such as cookies, pixels, tracking technologies and similar identifiers (“**Technologies**”), your Internet protocol (IP) address, and other device identifiers that are automatically assigned to your device, browser type and language, geo-location information, hardware type, operating system, internet service provider and other information about actions taken through the use of the Services and Website.
- d. **Information from Other Sources.** Iron Nation may also obtain information about you from other sources, including publicly or commercially available information, and through third-party data platforms, partners and service providers.
- e. **Information we collect from online interactions.** For example, if you attend a webinar, contact us via social media or otherwise interact with our business, including as a representative of a current or prospective customer, supplier or partner, we track and make a record of those interactions, which may contain your contact details, such as full name, email address, messages and any other information that you decide to provide us with.

(ii) We process information for the following purposes:

- a. **To allow you to make use of our Website.** We will use your information to allow you to make full use of our Website, including, (i) if you contact us to make a donation or invest in Israeli startups; (ii) To register you as an Israeli startup to receive funds; (iii) to analyze your use of our Website and to improve our Website; and (iv) to customize your experience.
- b. **For Administrative Purposes.** Iron Nation may use your information (i) to respond to your questions, comments, and other requests for customer support, or information, including information about potential or future services; (ii) for internal quality control purposes; and (iii) to generally administer the Services;.
- c. **Security purposes.** Some of the abovementioned information will be used for detecting, taking steps to prevent and prosecuting fraud or other illegal activity; to identify and repair errors; to conduct audits; and for security purposes. Information may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and to exercise or defend legal claims.

- d. **De-identified and Aggregated Information Use.** In certain cases, we may or will anonymize or de-identify your personal data and further use it for internal and external purposes, including, without limitation, to analyze and improve the Services (including through the use of artificial intelligence) and for research purposes. We may use this anonymous or de-identified information or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them and/or to develop new product features and improve existing offerings).
- e. **Cookies and Similar Technologies.** We, as well as third parties that provide content, advertising, or other functionality on our Website and the Services, use technologies to automatically collect information through the Website and Services. We use technologies that are essentially small data files placed on your device that allow us to record certain pieces of information whenever you visit or interact with the Website and Services. If you would like to opt out of the cookies and similar technologies we employ on the Website and Services, you may do so by blocking, deleting, or disabling them as your browser or device permits or by changing your setting and preferences [here](#) *[add an hyperlink to the cookie consent mechanism]*.

(iii) **The lawful bases we rely on for processing personal data are (if and when applicable):**

- a. The data subject has given consent to the processing of his or her personal data;
- b. Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c. processing is necessary for compliance with a legal obligation to which the controller is subject; and/or
- d. Processing is necessary for the purposes of the legitimate interest.

2. **HOW WE PROTECT AND RETAIN YOUR PERSONAL DATA**

- 2.1. **Security.** We have implemented and maintain reasonable technical, organizational and security measures designed to protect your information. However, please note that we cannot guarantee that the information will not be compromised as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.
- 2.2. **Retention of your information.** Your information will be stored until we delete our records, and we proactively delete it, or if you send a valid deletion request. Please note that in some circumstances we may store your information for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, and/or (iii) if we reasonably believe there is a prospect of litigation relating to your information or dealings.

3. **HOW WE SHARE YOUR PERSONAL DATA**

We may share your information as follows:

- 3.1. The information Iron Nation gathers is shared with our partners and other third parties.
- 3.2. We may also share information with our affiliated companies about you.
- 3.3. We may use third party service providers to process your information for the purposes outlined above, including, without limitation:
 - 3.3.1. With cloud service providers for hosting purposes;
 - 3.3.2. With websites and web content creation platforms in order to help us manage our Website;
 - 3.3.3. With email providers, marketing, CRM, other similar tool providers;
 - 3.3.4. With analytic companies, in order to help us understand and analyze information we collect in accordance with this policy; and
 - 3.3.5. With due diligence partners.
- 3.4. To the extent necessary, with regulators, courts, banks or competent authorities, to comply with applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies, or if required to do so by court order, as well as for internal compliance procedures and to protect the safety, security, and integrity of Iron Nation, our Services, customers, employees, property, and the public.
- 3.5. If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we may disclose your information to such third party (whether actual or potential) in connection with such events. In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your information in connection with the foregoing events.
- 3.6. Where you have otherwise provided your consent to us for sharing or transferring your information.

4. YOUR PRIVACY RIGHTS

- 4.1. The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by specific laws):
- i. You have the right to withdraw consent to the processing, where consent is the basis of processing.
 - ii. You have the right, under certain conditions, to access the personal data that we hold and request further details about how we process it.
 - iii. You have the right to demand rectification of inaccurate personal data about you. We will promptly correct any information found to be incorrect.
 - iv. You have the right to object to unlawful data processing under certain conditions.
 - v. You have the right to the erasure of past data about you (your “right to be forgotten”) under certain conditions.
 - vi. You have the right, under certain conditions, to demand that we restrict the processing of your personal data if you believe we have exceeded the legitimate basis for processing, the processing is no longer necessary, or if you believe your personal data is inaccurate.
 - vii. You have the right, subject to certain conditions, to data portability of personal data concerning you that you provided us in a structured, commonly used, and machine-readable format.
 - viii. The personal data we collect is not used for automated decision-making and profiling, except for automated processes in the context of marketing. As stated above, you can opt out of direct marketing by Iron Nation by contacting Iron Nation directly or by following the instructions through the unsubscribe options in our email messages.
- 4.2. You can exercise your rights by contacting us at privacy@ironnation.com. You may use an authorized agent to submit a request on your behalf if you provide the authorized agent written permission signed by you. To protect your privacy, we may take steps to verify your identity before fulfilling your request. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.
- 4.3. **Marketing emails – opt-out:** You may choose not to receive marketing email of this type by sending a single email with the subject "BLOCK" to privacy@ironnation.com. Please note that the email must come from the email account you wish to block **OR** if you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails, and we will process your request within a reasonable time after receipt.

5. INTERNATIONAL TRANSFERS OF PERSONAL DATA

- a) We store the personal data with the following storing companies: Hubspot.
- b) In order to run our business and provide our Website to you, we transfer personal data to certain countries around the world, including to our affiliates and service providers, many of whom are located outside of your jurisdiction. therefore, your personal data may be processed in countries with privacy laws that are different from privacy laws in your country. whenever we make such transfers, we will use commercially reasonable efforts to implement an appropriate level of protection to your personal data by implementing at least one of the following safeguards:
- i. making sure the destination country has been deemed to provide an adequate level of protection for personal data; and/or
 - ii. by executing implement data onward transfer instruments such as data processing and protection agreements.
6. **USE BY CHILDREN.** We do not offer our products or services for use by children and, therefore, we do not knowingly collect information from, and/or about children under the age of 18. If you are under the age

of 18, do not provide any information to us without the involvement of a parent or a guardian. In the event that we become aware that you provide information in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at privacy@ironnation.com.

7. **INTERACTION WITH THIRD PARTY PRODUCTS.** We enable you to interact with third party websites, mobile software applications and products or services that are not owned, or controlled, by us (each, a “**Third Party Service**”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect information from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

8. **ANALYTIC TOOLS/COOKIES**

- **Google Analytics.** The Website uses a tool called “**Google Analytics**” to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with information we collect. Google’s ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <https://marketingplatform.google.com/about/analytics/terms/us/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>. We reserve the right to remove or add new analytic tools, cookies, pixels and other tracking technologies.
- **Hubspot.** We use Hubspot for the purpose of optimizing our social media marketing, to better manage our content, and to help us optimize our Platform. For more information about Hubspot's privacy practices, please see their privacy policy available here: <https://legal.hubspot.com/privacy-policy>.
- We reserve the right to remove or add new analytic tools, cookies, pixels and other tracking technologies.

9. **SPECIFIC PROVISIONS APPLICABLE UNDER CALIFORNIA PRIVACY LAW**

9.1. **California Privacy Rights:** California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of information to third parties for their direct marketing purposes. To make such a request, please send an email to privacy@ironnation.com. Please note that we are only required to respond to one request per customer each year.

9.2. **Our California Do Not Track Notice:**

Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

10. **CONTACT US.** If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at privacy@ironnation.com.
