



BeeFree Agro Ltd. – Privacy Policy

This Privacy Policy (the “**Privacy Policy**”) is designed to inform you as to how BeeFree Agro Ltd. (referred to as “**BeeFree**”, “**we**”, “**us**” or “**our**” in this Privacy Policy) handles your Personal Data as a “data controller” in connection with your use of our website available at: <https://beefreeagro.com/> (the “**Website**”) and our Platform, as well as any other interaction with us (including via email or telephone) in which you provide your Personal Data to us, and notify you about your privacy rights and how the law protects such rights. The “**Platform**” means BeeFree’s proprietary software, developed and managed by BeeFree, in its latest version, together with any relevant documentation, content, and services, which may be connected to a drone, and which will be made available by BeeFree to you or to the organization that you are employed by, as a mobile application (the “**App**”) and/or as a web-based platform service via the internet (available at: <https://console.beefreeagro.com/>) (the “**Operational Website**”). “**Personal Data**” means any information about an individual from which that person can be identified.

Capitalized terms used but not otherwise defined in this Privacy Policy shall have the meanings ascribed to such terms in the Terms of Use.

We encourage you to read this Privacy Policy carefully and to regularly check this page to review any changes we might make to the terms of this Privacy Policy. This Privacy Policy supplements other policies we may provide as part of our interactions with you or policies you may have received from other controllers and is not intended to override such policies.

This Privacy Policy is provided in a layered format so you can click through to the specific areas set out below.

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1. Our role

To the extent that the European General Data Protection Regulation (“**GDPR**”) or the United Kingdom General Data Protection Regulation (“**UK GDPR**”) apply to Personal Data that we process in accordance with this Privacy Policy, we usually act as act as a “data controller” with respect to such processing.

In the event that you are using the Platform on behalf of a corporation, we act as a “data processor” and the entity on behalf of which you are using our Platform is the “data controller”, who determines, at its sole discretion, the means and purposes for which Personal Data that we collect as part of the services provided in the Platform can be used or processed. As the data controller, such entity is responsible for providing you with a privacy notice and information on rights that you may have under applicable privacy laws and therefore this Privacy Policy shall not apply to any processing we conduct as a “data processor”.

Notwithstanding the foregoing, we may act as a “data controller” with respect to the Drone Data, Location Data, Usage Data, Technical Data and Additional Inquiry Data, as further described below and this Privacy Policy shall apply to such processing.

2. The Data We Collect About You

We collect the following types of Personal Data when you use our Website:

- **Identity Data** includes your first and last name.
- **Contact Data** includes your email address and telephone number.
- **Payment Data** includes your payment instrument number (such as a credit card number) and the security code and expiration date associated with your payment instrument. Your Payment Data is processed by our payment processing vendors and is not stored by BeeFree.
- **Address Data** includes your country/region, state/country, town/city, street address, zip code and other details relating to your billing or delivery address.
- **Usage Data** includes information about how you use our Website (such as, when you entered the Website and how long you stayed on the Website or on a specific page).
- **Technical Data** includes information on your internet connection (such as your IP address and internet service provider name), on the device and software that you are using to access the Website (e.g., your web browser type and computer operating system).

We collect the following types of Personal Data when you use the Platform:

- **Identity Data** includes your first and last name.
- **Contact Data** includes your email address and telephone number.
- **Drone and Remote Data** includes all data received from the drone connected to the App, including its name, password, serial number, settings, photographs and/or videos taken by the drone, and geo-location. While using the Platform, the resolution of the photographs and/or videos taken by the drone is not designed to allow the identification of natural persons.
- **Location Data** includes your country/region, state/country, town/city, street address, zip code and the location of your (or your employer’s) farm, including its coordinates.
- **Usage Data** includes information about how you use our Platform (such as, when you entered the Platform and how long you stayed on the Platform or on a specific page).
- **Technical Data** includes information on your internet connection (such as your IP address and internet service provider name), on the device and software that you are using to access the Platform (e.g., your web browser type and computer operating system).
- **Additional Inquiry Data** includes additional information that you may provide when you contact us through the Platform.

We also collect, use and share aggregated data such as statistical data for any purpose. Such information does not reveal your identity and therefore is not considered Personal Data. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific feature available through the Platform.

Protecting the Privacy Rights of Third Parties

If you provide to us any Personal Data relating to others, you must make sure you have permission to do so.

3. How We Collect Your Personal Data

We use different methods to collect data from and about you including through:

- **Direct interactions.** When you enter or contact us through our Website, register to use our Platform, or otherwise provide your Personal Data directly to us, you will be asked to provide us with your Identity Data, Contact Data, and well applicable your Payment Data and Address Data, so that we can provide our services to you, respond to your questions or requests or otherwise contact you. You may also provide Additional Inquiry Data to us when you contact us.
- **Connection of a drone and the remote.** When you connect a drone and the remote to the Platform, we will receive the Drone Data contained therein. We collect this data in order to provide our services to you.
- **Automated technologies or interactions.** As you interact with our Website and/or our Platform, we automatically collect the applicable Technical Data and Usage Data. We collect this data by using cookies, server logs, and other similar technologies.
- **Third parties or publicly available sources.** We may receive Technical Data and Usage Data about you from third parties, such as Usage Data and Technical Data that we may receive from analytics providers, and from advertising and marketing partners.

4. How We Use Your Personal Data

We will only use your Personal Data when permitted by law. We will commonly use your Personal Data in the following circumstances:

- Where the processing is necessary in connection with the performance of any contract we have entered into with you or where it is necessary for taking steps at your request prior to entering a contract.
- Where the processing is necessary for our legitimate interests (or those of a third party), and such legitimate interests are not overridden by your interests, fundamental rights, or freedoms. Legitimate interest means our interest in managing and conducting our business.
- Where the processing is necessary for compliance with a legal or regulatory obligation.
- Where you have provided your consent for such processing. Such consent can be revoked at any time.

Purposes for Which We Use Your Personal Data

Below is a description of the ways we use your Personal Data. To the extent that the GDPR and UK GDPR apply, we have mentioned the legal bases we rely on to use your Personal Data, and identified what our legitimate interests are where appropriate:

- We use your Identity Data, Contact Data, Drone Data, Location Data, Payment Data and Address Data to enter into a contract or to perform a contract with you.
- We use your Contact Data and Additional Inquiry Data to respond to your requests or questions, and to manage our relationship with you, including by notifying you about changes to our Terms of Use or Privacy Policy. We do so for the performance of a contract with you, if it is necessary to comply with a legal obligation or if it is necessary for our legitimate interests.
- We use your Usage Data, Technical Data, and Contact Data for marketing purposes, to deliver relevant and personalized content to you, send service messages (for example, for security purposes) and to measure or understand the effectiveness of our marketing efforts. We do so where it is necessary for our legitimate interests (to grow our business, to inform our marketing strategy and to maintain and secure the services); or if we have obtained your prior consent (where laws require consent for such communications).
- We use your Usage Data, Technical Data and Drone Data (as applicable) to improve our Website and/or Platform, services, marketing, customer relationships and experiences, including by personalizing and customizing our content. We do so where it is necessary for our legitimate interests (to keep the Website and/or the Platform updated and relevant, to develop our business

and to inform our marketing strategy).

- In the event of a legal dispute between you (and/or a party on your behalf) to us (and/or a party on our behalf), we may use your Personal Data to the extent necessary in connection with handling such dispute. We do so where it is necessary for our legitimate interests (to defend and enforce our legal rights).
- We may also use your Personal Data as: (a) required by subpoena, law, or other legal process; (b) necessary to assist law enforcement officials or government enforcement agencies; (c) necessary to investigate violations of or otherwise enforce our Terms of Use, to maintain security of the Platform and prevent fraudulent or illegal activity; (d) necessary to protect us from legal action or claims from third parties, including you and/or other users; or (e) necessary to protect the legal rights, personal/real property, or personal safety of our company, users, employees, and affiliates. We do so based on our legitimate interest (to defend and enforce our legal rights and to protect and ensure the continuous operation of our Website and/or Platform).

Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data.

Promotional Offers

You may receive marketing communications from us if you have requested information from us and have not opted out of receiving marketing communications.

If you wish to stop receiving marketing communications from us, you may ask us to stop sending you marketing communications at any time by following the opt-out or unsubscribe link on any marketing message sent to you.

Cookies and Other Tracking Technologies

Our Platform uses cookies. A cookie is a small piece of data or a text file that is downloaded to your computer or mobile device when you access certain websites. Cookies may contain text that can be read by the web server that delivered the cookie to you. The text contained in the cookie generally consists of a sequence of letters and numbers that uniquely identifies your computer or mobile device; it may contain other information as well. We and third parties we partner with may store, and access some or all the cookies described below on your device.

Types of cookies:

- **Strictly Necessary Cookies.** These cookies are necessary for proper functioning of the Website and/or Platform, such as displaying content, logging in, validating your session, responding to your request for services, and other functions.
- **Performance Cookies.** These cookies collect information about the use of the Website and/or Platform, such as pages visited, traffic sources, users' interests, content management, and other website measurements.
- **Functional Cookies.** These cookies enable the Website and/or Platform to remember a user's choices – such as their language, user name, and other personal choices – while using the Website and/or Platform. They can also be used to deliver services, such as letting a user make a blog post, listen to audio, or watch videos on the Website and/or Platform.
- **Media Cookies.** These cookies can be used to improve a Website and/or Platform's performance and provide special features and content. They can be placed by third parties who provide services to us or by our company.
- **Advertising or Targeting Cookies.** These cookies are usually placed and used by advertising companies to develop a profile of your browsing interests and serve advertisements on other websites that are related to your interests.
- **Session Cookies.** These cookies allow websites to link the actions of a user during a browser session. Session cookies permit users to be recognized as they navigate a website so that any item

or page changes they make are remembered from page to page. Session cookies expire after a browser session; thus, they are not stored long term.

- **Persistent Cookies.** These cookies are stored on a user's device in between browser sessions, which allows the user's preferences or actions across a site (or, in some cases, across different sites) to be remembered. Persistent cookies may be used for a variety of purposes, including remembering users' choices and preferences when using a website or to target advertising to them.

Most web browsers can be set to disable the use of cookies. However, if you disable cookies, you may not be able to access features on our Website and/or Platform correctly or at all. Further details on how to disable cookies in different web browsers can be found here:

Internet Explorer: <http://windows.microsoft.com/en-GB/internet-explorer/delete-manage-cookies>

Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en>

Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Safari: <http://help.apple.com/safari/mac/8.0/#/sfri11471>

For example, our Website and/or Platform may use Google Analytics to collect information about the use of our Website and/or Platform. Google Analytics collects information from users such as age, gender, interests, demographics, how often they visit our website, what pages they visit, and what other websites they have used before coming to our website. We may use the information we get from Google Analytics to analyze traffic, improve our marketing, advertising, and to improve our Website and/or Platform. For more information on how Google collects and processes your data, visit <https://www.google.com/policies/privacy/partners/>. You can prevent Google Analytics from using your information by opting out at this link: <https://tools.google.com/dlpage/gaoptout>.

We may also utilize Facebook's remarketing services to deliver tailored advertisements to individuals who have previously interacted with our Website and/or Platform. Facebook collects certain information from your device, such as your IP address, browser information, and actions taken on our Website and/or Platform. To receive additional information on how Facebook collects and processes your data and to adjust your preferences, visit <https://www.facebook.com/help/568137493302217>.

We may also use a technology called web beacons to collect general information about your use of our Website and/or Platform and your use of special promotions or newsletters. The information we collect by web beacons allows us to statistically monitor the number of people who open our emails. Web beacons also help us to understand the behavior of our customers, members, and visitors.

Third parties may use cookies, web beacons, and other storage technologies to collect or receive information from our Website and/or Platform and elsewhere on the internet, and use that information to provide measurement services and target ads.

Third-Party Links

The Website and/or Platform may include links to third-party websites, plug-ins and applications. Clicking on those links or interacting with such content may allow your data to be shared with the relevant third-party. We do not control these third-party websites and are not responsible for their privacy statements; we therefore recommend that you read the Privacy Policy of every website you visit.

5. Sharing Your Personal Data with Third Parties

We share Personal Data with third party service providers that provide us services in connection with the purposes listed above.

For example, we may share your applicable Identity Data, Contact Data, Usage Data and Technical Data with web analytics providers, email and marketing service providers and other vendors that assist us in maintaining the Website and/or Platform (including website hosting services). Please also see the description above in the section titled Cookies and Other Tracking Technologies.

We may also share your applicable Identity Data and Contact Data with third parties to confirm your identity, and we may also share your Identity Data, Contact Data, Payment Data and Address Data process payments made through the Website.

We may also share your Personal Data with legal and regulatory authorities to the extent required by applicable law our professional advisors (e.g. lawyers, accountants) to the extent necessary for the provision of their services to us; and third parties to whom we may choose to sell, transfer, or merge our business (or parts thereof) or our assets, or parties whose business we wish to acquire.

6. **Minors**

In order to use the Website and/or Platform, you must be at least 18 years of age, or older, if otherwise required by the laws of the country you reside in. Our Website and/or Platform is not designed for use by anyone under the age of 18 and we do not knowingly collect Personal Data from children under the age of 18.

If you are a parent or legal guardian and have concerns about your child's privacy, or if you believe that your child may have provided us with their Personal Data, please contact us using the [Contact Details](#) below. When you approach us as a parent or legal guardian, we may request that you provide certain information needed to confirm your identity, in order to prevent malicious removal of account information.

7. **International Transfers**

We may transfer your Personal Data to countries outside of the country in which you reside (including outside of the European Economic Area (EEA) or the United Kingdom (UK)), that do not necessarily provide the same level of data protection as the country in which you reside and are not recognized by the European Commission and/or the applicable UK authority as providing an adequate level of data protection.

Our international transfers of Personal Data are done for the performance of a contract or implementation of pre-contractual relations with you, based on your consent, or subject to safeguards that ensure the protection of your Personal Data, such as standard contractual clauses approved by the European Commission and/or the applicable UK authority (when the transfer is outside of the EEA or the UK).

8. **Data Security**

We have put in place security measures intended to prevent your Personal Data from accidental or unlawful loss, use, alteration or disclosure. We also maintain reasonable technical and physical safeguards to protect your Personal Data. Unfortunately, we cannot guarantee against the loss or misuse of your Personal Data or secure data transmission over the Internet because of its nature.

9. **Data Retention**

We retain your Personal Data for as long as necessary to fulfill the purposes we collected it for, including for legal or reporting requirements.

In order to determine the appropriate retention period for Personal Data, we consider the following criteria: the volume, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of Personal Data, the purposes for which we collect and process Personal Data, the timeframe during which we may require such Personal Data in connection with potential litigation, and applicable legal requirements.

10. Your Rights

Certain privacy laws, including the GDPR and UK GDPR, provide users with rights related to their Personal Data. To the extent that such laws apply to your Personal Data, you may have the following rights:

- **Request access.** This means that you may receive a copy of the Personal Data we hold about you.
- **Request correction.** This means that you may ask us to correct or complete inaccurate or incomplete data that we hold about you.
- **Request erasure.** This means that you may ask us to delete or remove Personal Data that we hold about you. If we are unable to comply with such request, we will notify you of the specific legal reasons for our decision.
- **Object to processing.** This means that you may object to the processing of your Personal Data where it is used for direct marketing purposes, or where we are relying on a legitimate interest and you feel that such interest is overridden by your rights and freedoms.
- **Request restriction of processing.** This means that you may ask us to suspend the processing of your Personal Data if you believe that such data is inaccurate, if our processing is unlawful or if we no longer need to process such data for a particular purpose, but you need us to continue to hold the data.
- **Data Portability.** This means that you may request that we transfer your Personal Data to you or to a third party. This right applies where we have obtained and processed the data from you based on your consent or where we used the information to perform a contract with you.
- **Withdraw consent at any time.** This means that you may withdraw your consent where we are processing your Personal Data based on your consent.

If you wish to exercise any of the rights set out above, please [contact us](#).

What We May Need From You

When you approach us with a request to exercise one of your rights, we may request that you provide us with information needed to confirm your identity as a security measure to ensure that your Personal Data is not disclosed to any person who has no right to receive it.

Time Limit to Respond

We try to respond to all legitimate requests within one month or less, if required by law. Where it takes us more than one month to respond (for example, where your request is particularly complicated or where you have made a number of requests) we will notify you and keep you updated.

11. Accessibility

If you have a disability and would like to access this Privacy Policy in an alternative format, please contact us via our [Contact Details](#) listed below.

12. Contact Details

If you have any questions or concerns, please contact us at:

Email: support@beefreeagro.com

Postal address: HaCarmel 3, Yokne'am Ilit

You have the right to make a complaint at any time to data protection authorities. We would, however, appreciate the chance to address your concerns before you approach a data protection authority, so please contact us in the first instance.

13. Changes to this Privacy Policy

We reserve the right to change this Privacy Policy at any time. If we do so, we will post an updated version of this Privacy Policy so that our users and customers are always aware of what information we collect, use, and disclose. Your continued use of the Website and/or Platform after any change to this Privacy Policy will constitute your acceptance of such change.

This version was last updated on August 14 2023.