FeeX Inc. - Privacy Policy
Last Revised: September 2, 2020

If you are a California resident, please refer to our Privacy Notice for California Residents.

FeeX Ltd., its affiliates and its existing subsidiaries (if any) ("FeeX", "Company", "we" or "us") respects the privacy of the users of its website at the address www.feex.com (the “User” or “you” and the “Site” respectively) and is committed to protect the personal information that its Users share with it. We believe that you have a right to know our practices regarding the information we may collect and use when you use our Site. Capitalized terms which are not defined herein, shall have the meaning ascribed to them in our Terms of Use, which this Privacy Policy is incorporated thereto by reference.

1. YOUR CONSENT (PLEASE READ CAREFULLY!)

BY ACCESSING THE SITE AND/OR USING THE SITE, YOU AGREE TO THE TERMS AND CONDITIONS SET FORTH IN THIS PRIVACY POLICY (THE “PRIVACY POLICY”), INCLUDING TO THE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION (AS DEFINED BELOW). IF YOU DISAGREE TO ANY TERM PROVIDED HEREIN, YOU MAY NOT USE THE SITE.

2. WHICH INFORMATION WE MAY COLLECT ON OUR USERS?

We may collect two types of data and information from our Users:

a. The first type of information is “Non-personal Information” which is non-identifying and non-identifiable information, without particular reference to the identity of the User from which such information was collected. Non-Personal Information is any unconcealed information which is available to us while Users are using the Site. Non-personal Information, which is being gathered consists of behavioral information, and may contain, among other things, the activity of the User on the Site, Users’ click-stream on the Site etc.

b. Other type of information is “Personal Information” which is individually identifiable information that identifies an individual, or may with reasonable effort identify an individual, either alone or in combination with other information, or may be of private or sensitive nature. Personal Information which is being gathered consists of any personal details provided consciously and voluntarily by the User. The Personal Information required from the User while filling in the Contact forms (including “Login” feature or “Get in Touch with us”) may includes the User’s full name, e-mail address, country, company and job title and the User may voluntarily provide his email and/or his phone number or other information as part of a dedicated message to us.

c. For avoidance of doubt, any Non-Personal Information connected or linked to any Personal Information shall be deemed as Personal Information as long as such connection or linkage exists. Under this Privacy Policy, the term “Information” shall mean both Personal and Non-personal Information.

WE DO NOT COLLECT ANY PERSONAL INFORMATION FROM YOU OR RELATED TO YOU WITHOUT YOUR APPROVAL, WHICH IS OBTAINED, INTER ALIA, THROUGH YOUR ACTIVE ACCEPTANCE TO THE TERMS AND THE PRIVACY POLICY.

3. HOW DO WE COLLECT INFORMATION ON OUR USERS?

There are two main methods we use:

- Manual submission
- Automatic processing
a. **We collect information through your use of the Site.** In other words, when you are a User of the Site we are aware of it and may gather, collect and record the information relating to your usage, either independently or through the help of third-party services as detailed below.

b. **We collect information which you provide us voluntarily.** For example, we collect Personal information which you voluntarily provide when you fill different forms in the Site, or contact us in any other way. We store the Personal Information either independently or through the help of our authorized third-party service providers as detailed below.

4. WHAT ARE THE LEGAL BASIS AND PURPOSES OF THE COLLECTION OF INFORMATION?

a. We collect, process and use your Information for the purposes described in this Privacy Policy, based at least on one of the following legal grounds:

i. **With your consent:** We ask for your consent, under this Privacy Policy, to process your Information for specific purposes and you have the right to withdraw your consent at any time.

ii. **When providing you with access to the Site:** We collect and process your Information in order to provide: (i) you access to the Site, following your acceptance of this Privacy Policy; (ii) to maintain and improve our Site; (iii) to develop new services and features for our Users; (iv) and to personalize the Site in order for you to get a better user experience.

iii. **Legitimate interests:** We process your Information for our legitimate interests while applying appropriate safeguards that protect your privacy. This means that we process your Information for things like detecting, preventing, or otherwise addressing fraud, abuse, security, usability, functionality or technical issues with our services, protecting against harm to the rights, property or safety of our properties, or our users, or the public as required or permitted by law; Enforcing legal claims, including investigation of potential violations of this Privacy Policy; in order to comply and/or fulfil our obligation under applicable laws, regulation, guidelines, industry standards and contractual requirements, legal process, subpoena or governmental request, as well as our Terms of Service.

b. **Non-personal Information and Personal Information are collected in order to:**

i. to provide you with and to operate the Site, including for statistical and research purposes and creation of aggregated anonymous data;

ii. to develop, improve and customize the Site, the experience of other users and the offering available through the Site;

iii. to be able to contact Users for the purpose of providing them with technical assistance, support, handle requests and complaints and collect feedback in connection with performance of the Site;

iv. to send you updates, notices, announcements, and additional information related to the Site;

v. to be able to reply to User online queries in connection with performance of the Site;

vi. to display or send to you marketing and advertising material when you are using the Site, including in accordance with the section titled ‘Direct Marketing’ herein; and

vii. to comply with any governmental agencies’ legal requests or court orders, and/or with any applicable law, rule or regulation.

5. SHARING INFORMATION WITH THIRD PARTIES
FeeX will not share any Personal Information it collects with any third party. Notwithstanding, FeeX may disclose Personal Information in the following cases: (a) to satisfy any applicable law, regulation, legal process, subpoena or governmental request; (b) to enforce this Privacy Policy and/or the Terms of Use,
including investigation of potential violations thereof; (c) to detect, prevent, or otherwise address fraud, security or technical issues; (d) to respond to User’s support requests; (e) respond to claims that any content available on the Site violates the rights of third-parties; (f) to respond to claims that contact information (e.g. name, e-mail address, etc.) of a third-party has been posted or transmitted without their consent or as a form of harassment; (g) to protect the rights, property, or personal safety of FeeX, its Users, or the general public; (h) when FeeX is undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of its assets; or (i) to collect, hold and/or manage your Personal Information through FeeX’s authorized Third Party Service Providers (as defined below), as reasonable for its business purposes, which may be located in a country that does not have the same data protection laws as your jurisdiction; (j) pursuant to your explicit approval prior to the disclosure; or (k) cooperate with third parties for the purpose of enhancing the User’s experience.

For avoidance of doubt, FeeX may transfer and disclose Non-personal Information to third parties at its own discretion.

6. DATA RETENTION

We retain the Personal Information we collect only for as long as needed in order to provide you with our services and to comply with applicable laws and regulations. We then either delete from our systems or anonymize it without further notice to you.

If you withdraw your consent to us processing your Personal Information, we will delete your Personal Information from our systems (except to the extent such data in whole or in part to comply with any applicable rule or regulation and/or response or defend against legal proceedings versus us or our affiliates).

7. MINORS

To use of Site, you must be over the age of sixteen (16). Therefore, FeeX does not knowingly collect Personal Information from children under the age of sixteen (16) and does not wish to do so. We reserve the right to request proof of age at any stage so that we can verify that minors under the age of sixteen (16) are not using the Site.

8. SECURITY

We take a great care in implementing and maintaining the security of FeeX’s Site and its User’s Personal Information. FeeX employs industry standard procedures and policies to ensure the safety of its Users’ Personal Information, and prevent unauthorized use of any such information. However, we do not guarantee that unauthorized access will never occur.

9. THIRD PARTY SOFTWARE/SERVICE

While using the Service we may be using third party software and/or service for various needs, inter alia, in order to collect and/or process the information detailed herein (the “Third Party Service Provider(s)”)

Note that these are independent software and/or service providers and FeeX does not take any liability about the information collection policies of these providers, or about any kind of issue, legal or otherwise, relating thereto. Third Party Service Provider’s includes the following:

i. Google Analytics, which privacy policy is available at: http://www.google.com/intl/en/analytics/privacyoverview.html

ii. Tableau, which privacy policy is available at: http://www.tableau.com/privacy

iii. Envestnet Yodlee, which privacy policy is available at: https://www.yodlee.com/legal/privacy-notice/
iv. Snowplow, which privacy policy is available at: https://snowplowanalytics.com/privacy-policy/

10. COOKIES & LOCAL STORAGE

When you access or use the Site, Company may use industry-wide technologies such as "cookies" or similar technologies, which stores certain information on your computer ("Local Storage") and which will allow us to enable automatic activation of certain features, and make your Site experience much more convenient and effortless. The cookies used by the Site are created per session and registration does not include any information about you, other than your session key (usually removed as your session ends) and the ability to login again quickly. It is easy to prohibit the Local Storage. Most browsers will allow you to erase cookies from your computer's hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. However, if you block or erase cookies your online experience with the Service may be limited.

11. WHERE DO WE STORE USER’S PERSONAL INFORMATION?

Information regarding the Users will be maintained, processed and stored by us and our authorized affiliates and service providers in the United States, Australia and in Israel, and as necessary, in secured cloud storage, provided by our Third Party Service Provider(s).

While the data protection laws in the above jurisdictions may be different than the laws of your residence or location, please know that we, our affiliates and our service providers that store or process your Personal Information on the our behalf are each committed to keep it protected and secured, pursuant to this Privacy Policy and industry standards, regardless of any lesser legal requirements that may apply in their jurisdiction.

You hereby accept the place of storage and the transfer of information as described above.

12. JOB CANDIDATES

The Company welcomes all qualified candidates (“Candidates”) to apply to any of the open positions posted on our Site or otherwise (including without limitation - Facebook, LinkedIn) by sending us their contact details and CV (“Candidates Information). We are committed to keep Candidates’ Information private and use it solely for our internal recruitment purposes (including for identifying Candidates, evaluating their applications, making hiring and employment decisions, and contacting Candidates by phone or in writing).

Please note that the Company may retain Candidates Information submitted to it even after the applied position has been filled or closed. This is done so we could re-consider Candidates for other positions and opportunities at the Company; so, we could use their Candidates Information as reference for future applications submitted by them; and in case the Candidate is hired, for additional employment and business purposes related to their work.

If you previously submitted your Candidates Information to the Company, and now wish to access it, update it or have it deleted from our systems, please contact us at: jobs@feex.com

13. UPDATING, OBTAINING A COPY OF, OR DELETING YOUR PERSONAL INFORMATION

If the law applicable to you grants you such rights, you may ask to access, correct, or delete your Personal Information that is stored in our systems. You may also ask for our confirmation as to whether or not we process your Personal Information.

Subject to the limitations in law, you may request that we update, correct, or delete inaccurate or outdated information. You may also request that we suspend the use of any Personal Information whose accuracy you contest while we verify the status of that data.
Subject the limitations in law, you may also be entitled to obtain the Personal Information you directly provided us (excluding data we obtained from other sources) in a structured, commonly used, and machine-readable format and may have the right to transmit such data to another party.

If you wish to exercise any of these rights, contact us at: legal@feex.com. When handling these requests, we may ask for additional information to confirm your identity and your request. Please note, upon request to delete your Personal Information, we may retain such data in whole or in part to comply with any applicable rule or regulation and/or response or defend against legal proceedings versus us or our affiliates.

To find out whether these rights apply to you and on any other privacy related matter, you can contact your local data protection authority if you have concerns regarding your rights under local law.

14. DIRECT MARKETING
You hereby agree that we may use your contact details provided during registration, for the purpose of informing you regarding our products and Site which may interest you, and to send to you other marketing material. You may withdraw your consent via sending a written notice to the Company by email to the following address: legal@feex.com or by pressing the “Unsubscribe” button in the mail.

15. CHANGES TO THE PRIVACY POLICY
The terms of this Privacy Policy will govern the use of the Site and any information collected therein. FeeX reserves the right to change this policy at any time, so please re-visit this page frequently. We will provide notice of substantial changes of this policy on the homepage of the Site and/or we will send you an e-mail regarding such changes to the e-mail address that you may have provided us with. Such substantial changes will take effect seven (7) days after such notice was provided on our Site or sent by email. Otherwise, all other changes to this Privacy Policy are effective as of the stated “Last Revised” date and your continued use of the Site after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes.

16. GENERAL INFORMATION
This Privacy Policy, its interpretation, and any claims and disputes related hereto, shall be governed by the laws of the State of Israel, without respect to its criminal law principles. Any and all such claims and disputes shall be brought in, and you hereby consent to them being litigated in and decided exclusively by a court of competent jurisdiction located in Tel Aviv, Israel.

This Privacy Policy was written in English, and may be translated into other languages for your convenience. If a translated (non-English) version of this Privacy Policy conflicts in any way with the English version, the provisions of the English version shall prevail.

17. HAVE ANY QUESTIONS?
If you have any questions (or comments) concerning this Privacy Policy, you are welcome to send us an email to the following address, and we will make an effort to reply within a reasonable timeframe: legal@feex.com.