

## Privacy Policy

Effective Date: 01.10.2024

BRAINCENTRE LTD an Israeli company (registration num. 517057311) ("**Braincentre**"), enables you to leverages AI to analyze emails and attachments, extracting key metadata and summarizing their content (the "**Platform**"), used by law firms, organizations and businesses across the world (each, a "**Customer**").

We also operate the website [brain-cente.com](https://brain-cente.com) its subdomains, pages and related features (the "**Site**", and together with the Platform – the "**Services**").

This Privacy Policy describes the personal data we typically receive or collect whenever someone visits our Site (a "**Visitor**") or uses the Services on behalf of our Customer (a "**User**"), as well as the Personal Data we may receive from third parties, regarding our Users or potential customers (a "**Prospect**").

In particular, this Privacy Policy describes how we collect personal data, for which purposes we may use such data, where we store it, for how long we retain it, with whom we may share it, our use of tracking technologies, our communications and security practices, your choices and rights (whether you are a Visitor, a Prospect or a User, "you") regarding such data, our role as a data controller, and how to contact us if you have any concerns regarding this Policy or your privacy.

**Please read this Privacy Policy and make sure that you fully understand and accept it. If you object to our practices, please discontinue and avoid using our Services.**

You are not legally required to provide us with any personal data, and may do so (or avoid doing so) at your own free will. If you do not wish to provide us with your personal data, or to have it processed by us or any of our service providers in accordance with this Policy, please avoid any interaction with us or any use of our Services.

### 1. Data Collection

Braincentre collects data regarding our Visitors, Prospects, Customers and Users. Such data is typically collected and generated through your interaction with our Services, through automatic means, directly from you or from certain third-parties.

Specifically, we collect the following categories of data (which, to the extent it relates to an identified or identifiable individual, will be deemed as "**Personal Data**"):

**Data automatically collected or generated:** When someone visits, interacts with, or uses our Services, including any e-mail sent to them via our Services, we may collect or generate certain technical data about them. We collect or generate such data either independently or with the help of our Service Providers (as detailed in Section 5 below), including through the use of "cookies" and other tracking technologies (as further detailed in Section 6 below). Such data mainly consists of technical or usage data, such as IP address, data regarding a device, operating system and browser, and user activity on our Services. We do not use such data to learn about a person's true identity or contact details, and it mostly serves us to better understand how our Users and Visitors typically use and engage with our Services and to improve our marketing campaigns and engagements, as well as the overall performance of our Services.

**Data received from you:** When you sign up to the Services and create your User account, you may provide us with your Personal Data. This may include your name, company and position,

contact details (such as business e-mail, phone and address), account login details (such as usernames and hashed passwords), as well as any other data you choose to provide when you use our Services or create a User account. In addition, you may provide us additional details concerning your organization (our Customer), such as billing details, business needs and preferences. To the extent that such data concerns a non-human entity, we do not regard it as “Personal Data” and this Policy shall not apply to it.

**Data received when you contact us:** You may contact us for support, learning more about our Services and offerings, or for any other reason. In doing so you may provide us Personal Data such as your name, email, workplace and position and any other data you choose to provide or that we may require in order to properly review your inquiry. Similarly, you may also provide us with your Personal Data when you contact us via social media (such as [LinkedIn](#), [Facebook](#) and [Twitter](#)).

**Data received from our Customers and Users:** We may receive personal data when Users use our Services by submitting legal documents (such as contracts and drafts for review). This may be done through an e-mail or by uploading such documents directly to the Service following which such documents will be reviewed by the Platform. Such data may include contact details such as business e-mail and phone number. Customers and Users may also provide us with data concerning other users who are authorized to access and use our Services. Such data usually includes Users’ names/nicknames and work e-mails.

**Customer Data containing Personal Data:** When a Customer uses our Services, we may have access to additional information such as Customer’s clients’ details or employees (“**Customer Data**”). This can occur for example when our Customers send us contracts or drafts for review which include such information or if they instruct us to send the documents back to their employees (who may not necessarily use the Services independently). If we have been exposed to Personal Data that has been shared with us by our Customer, who is the owner of the respective account, such Customer Data will only be stored and processed subject to our Terms of Use and this Privacy Policy (as further explained in Section 10 below).

**Data received from third-parties:** We may receive your Personal Data from other sources. For example, if you participate in an event or webinar that we sponsor or participate in, we may receive your Personal Data from the event organizers. We may also receive your contact and professional details (e.g., your name, company, position, contact details and professional experience, preferences and interests) from our business partners, Customers or service providers, and through the use of tools and channels commonly used for connecting between companies and individuals in order to explore potential business and employment opportunities, such as LinkedIn and data enrichment services.

**Non-personal (anonymous) and statistical data:** Such data does not and may not relate or refer to any specific individual, and we therefore do not regard it as “Personal Data” and may use it without restriction, for example to aggregate data for industry benchmarks or comparative performance metrics, that we might publish from time to time.

## 2. Data Uses

We use and process Visitors, Prospects, Users and Customers’ Personal Data as well as other types of Personal Data, as necessary for the performance of our Services; to comply with our legal and contractual obligations; and to support our legitimate interests in maintaining and improving our Services and offerings, e.g. in understanding how our Services are used and how our campaigns are performing, and gaining insights which help us dedicate our resources and efforts

more efficiently; in marketing, advertising and selling our Services; providing customer service and technical support; and protecting and securing our Customers, Users, Prospects and Visitors, ourselves and our Services.

If you reside or are using the Service in a territory governed by privacy laws which determine that “consent” is the only or most appropriate legal basis for processing Personal Data, your acceptance of our Terms of Use and of this Privacy Policy will be deemed as your consent to the processing of your Personal Data for all purposes detailed in this Privacy Policy. If you wish to revoke such consent, please contact us by email at [meir.krasniker@brain-centre.com](mailto:meir.krasniker@brain-centre.com).

**Specifically, we use Personal Data for the following purposes:**

1. To facilitate, operate, and provide our Services;
2. To authenticate the identity of our Users and allow them to access and use our Services;
3. To provide our Users and Customers with customer care, assistance and technical support services;
4. To further develop, customize and improve the Services, and to improve your user experience, based on common or personal preferences, experiences and difficulties;
5. To facilitate and optimize our marketing and advertising campaigns, ad management and sales operations, and to manage and deliver advertisements for our products and services more effectively;
6. To contact our Visitors, Prospects, Users and Customers with general or personalized service-related messages (such as password-retrieval or billing), or with promotional messages (such as newsletters, special offers, new features etc.), in accordance with Section 7 below, and to facilitate, sponsor and offer certain events and promotions;
7. To support and enhance our data security measures, including for the purposes of preventing and mitigating the risks of fraud, error or any illegal or prohibited activity;
8. To create aggregated statistical data, inferred non-personal data or anonymized or pseudonymized data (rendered non-personal), which we or our business partners and Customers may use to provide and improve our respective services and offerings; and
9. To comply with any applicable laws and regulations.

**We do not sell your personal information for the intents and purposes of the California Consumer Privacy Act (CCPA).**

### 3. Data Location

We and our authorized Service Providers (defined below) maintain, store and process Personal Data in the United States, Israel, Germany, and other locations as reasonably necessary for the proper performance and delivery of our Services, or as may be required by law.

Braincentre is headquartered in Israel, a jurisdiction which is considered by the European Commission to be offering an adequate level of protection for the Personal Data of EU Member State residents. While privacy laws may vary between jurisdictions, Braincentre and its affiliates and Service Providers are each committed to protect Personal Data in accordance with this Privacy Policy, customary industry standards, and such appropriate lawful mechanisms and

contractual terms requiring adequate data protection, regardless of any lesser legal requirements that may apply in the jurisdiction from which such data originated.

#### 4. Data Retention

We retain Personal Data of Users as instructed or authorized by our Customer, and thereafter in accordance with our data retention policy. We retain Customers, Visitors and Prospects Personal Data as reasonably necessary in order maintain and expand our relationship and provide you with our Services and offerings; in order to comply with our legal and contractual obligations, or to protect ourselves from any potential disputes (i.e. as required by laws applicable to log-keeping, records and bookkeeping, and in order to have proof and evidence concerning our relationship, should any legal issues arise following your discontinuance of use), all in accordance with our data retention policy.

Please note that except as required by applicable law or our specific agreements with you, we will not be obligated to retain your Personal Data for any particular period, and we are free to securely delete it or restrict access to it for any reason and at any time, with or without notice to you. If you have any questions about our data retention policy, please contact us by e-mail at [meir.krasniker@brain-centre.com](mailto:meir.krasniker@brain-centre.com).

#### 5. Data Sharing

**Legal Compliance:** In exceptional circumstances we may disclose or allow government and law enforcement officials access to certain Personal Data, in response to a subpoena, search warrant or court order (or similar requirement), or in compliance with applicable laws and regulations. Such disclosure or access may occur if we believe in good faith that: (a) we are legally compelled to do so; (b) disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing; or (c) such disclosure is required to protect our legitimate business interests, including the security or integrity of our products and Services.

**Sharing User Personal Data with Their Organization:** We may share with our Customer the Personal Data of their Users (including data concerning their User account on the Services and communications). In such cases, sharing such data with our Customer means that other Users from your organization may receive it on its behalf, and will be able to monitor, process and analyze your Personal Data and associated content. Please note that Braincentre is not responsible or controls any further disclosure, use or monitoring by or on behalf of your organization.

**Service Providers:** We may engage selected third-party companies and individuals to perform certain services complementary to our own. Such Service Providers include hosting and server co-location services, communications and content delivery networks (CDNs), data analytics services (including Google Analytics, as further explained below), marketing agencies and advertising services, data and cyber security services, fraud detection and prevention services, customer engagement services, billing and payment processing services, e-mail and SMS distribution and monitoring services, remote access services, call recording and analysis services, session or activity recording services, performance measurement, data optimization and marketing services, social and advertising networks, content providers, support and customer relation management systems and our business, legal, financial and compliance advisors (collectively, “**Service Providers**”). These Service Providers may have access to your

Personal Data, depending on each of their specific roles and purposes in facilitating and enhancing our Services, and may only use it for such purposes.

**Third-Party Websites and Services:** Our Services may include links to third-party websites, and integrations with third-party services. Such websites and third-party services, and any information you process, submit, transmit or otherwise use with such websites and third-party services, are governed by such third-party's terms and privacy practices and policies, and not by this Privacy Policy. We encourage you to carefully read the terms and privacy policies of such website and third-party services.

**Protecting Rights and Safety:** We may share Personal Data with others, if we believe in good faith that this will help protect the rights, property or personal safety of Braincentre, any of our Customers, Users, Visitors or any members of the general public.

**Change of Control:** We may share Personal Data internally within our group, for the purposes described in this Privacy Policy. In addition, should Braincentre or any of its subsidiaries or affiliates undergo any change in control or ownership, including by means of merger, acquisition or purchase of substantially all or part of Braincentre's assets or will be considered or found eligible for a governmental grant, Personal Data may be shared with the parties involved in such an event. If we believe that such event might materially affect your Personal Data then stored with us, we will notify you of this event and the choices you may have via e-mail or prominent notice on our Services.

For the avoidance of doubt, we may share your Personal Data in additional manners, pursuant to your explicit approval, or if we are legally obligated to do so, or if we have successfully rendered such data non-personal, non-identifiable and anonymous. We may transfer, share or otherwise use non-personal and non-identifiable data in our sole discretion and without the need for further approval.

## 6. Cookies and Tracking Technologies

Braincentre and our Service Providers use "cookies", pixel tags and other technologies for performance, tracking, analytics and personalization purposes. We may share non-identifiable/aggregated extracts of such information with our partners for our legitimate business purposes.

Cookies are packets of information sent to your web browser and then sent back by the browser each time it accesses the server that sent the cookie. Some cookies are removed when you close your browser session – these are the "Session Cookies". Some last for longer periods and are called "Persistent Cookies". We use both types. We use Persistent Cookies to remember your log-in details and make it easier for you to log-in the next time you access the Services. We may use this type of cookies and Session Cookies for additional purposes, to facilitate the use of the Services' features and tools.

Whilst we do not change our practices in response to a "Do Not Track" signal in the HTTP header from a browser or mobile application, you can manage your cookies preferences, including whether or not to accept them and how to remove them through your browser settings. Please bear in mind that disabling cookies may complicate or even prevent you from using the Services.

We use Google Analytics to collect information about the use of our Services. Google Analytics collects information such as how often users visit the Services, which pages they visit when they do so, and which other sites they used prior to coming to our Services. We do not merge the

information collected through the use of Google Analytics with personally identifiable information.

Google's ability to use and share information collected by Google Analytics about your visits to and use of the Services is restricted by the [Google Analytics Terms of Service](#) and the Google [Privacy Policy](#).

You may learn more about how Google collects and processes data specifically in connection with Google Analytics [here](#). Further information about your option to opt-out of these analytics services is available [here](#).

Please note that if you get a new computer, install a new browser, erase or otherwise alter your browser's cookie file (including upgrading certain browsers), you may also clear the opt-out cookies installed once you opt-out, so an additional opt-out will be necessary to prevent additional tracking.

For more information, please see our Cookie Policy.

## 7. Communications

We engage in service and promotional communications, through e-mail, phone and notifications.

**Service Communications:** We may contact you with important information regarding our Services. For example, we may send you notifications (through any of the means available to us) of changes or updates to our Services, billing issues, log-in attempts or password reset instructions, alerts and notifications concerning anomalies detected by our Services, etc. You can control your communications and notifications in accordance with the instructions included in the communications sent to you. Please note that you will not be able to opt-out of receiving certain service communications which are integral to your use (like password resets or billing notices).

**Notifications and Promotional Communications:** We and our authorized partners (e.g. event or webinar co-sponsors) may also notify you about new features, additional offerings, events, webinars, special opportunities or any other information we think you will find valuable. Such notices may be provided through any of the contact means available to us (e.g. phone, mobile or e-mail), through the Services, or through our marketing campaigns on any other sites or the Platform.

If you do not wish to receive such promotional communications, you may notify Braincentre at any time by e-mailing us at [meir.krasniker@brain-centre.com](mailto:meir.krasniker@brain-centre.com) or by following the "unsubscribe", "stop", "opt out" or "change e-mail preferences" instructions contained in the promotional communications you receive.

## 8. Data Security

We and our Service Providers implement systems, applications and procedures to secure your Personal Data, and to minimize the risks of theft, damage, loss of information, or unauthorized access or use of information. These include industry-standard physical, procedural and electronic security measures, as well as encryption tools and methods where deemed appropriate. However, although we make efforts to protect your privacy and data, we cannot and do not guarantee the absolute protection and security of any Personal Data stored with us or with any of our Service Providers.

## 9. Roles and Responsibilities

Certain data protection laws and regulations, such as the GDPR or the CCPA, typically distinguish between two main roles for parties processing Personal Data: the “**data controller**” (or under the CCPA, “**business**”), who determines the purposes and means of processing; and the “**data processor**” (or under the CCPA, “**service provider**”), who processes the data on behalf of the data controller (or business). Below we explain how these roles apply to our Services, to the extent that such laws and regulations apply.

Braincentre is the “data controller” of its Visitors, Prospects and Customers. With respect to such data, we assume the responsibilities of data controller (solely to the extent applicable under law), as set forth in this Privacy Policy. In such instances, our Service Providers processing such data will assume the role of “data processors”.

If any of our Users upload or submit Customer Data or other content to our Service which includes Personal Data (e.g., by submitting their own clients’ contact details to one of the Service), such data will only be processed by us on behalf of our Customer, which is the owner of the respective account.

Accordingly, Braincentre processes such Customer Data strictly in accordance with such Customer’s reasonable instructions, our Terms of Use and as further stipulated in other commercial agreements with such Customer. The Customer will be solely responsible for meeting any legal requirements applicable to data controllers (such as establishing a legal basis for processing, providing adequate notice to their users and responding to Data Subject Rights requests concerning the data they control).

## 10. Data Subject Rights

Individuals have rights concerning their Personal Data. If you wish to exercise your privacy rights under the laws which apply to you, for example (to the extent applicable) the EU General Data Protection Regulation (GDPR) or the California Consumer Privacy Act (CCPA), such as the right to request access to and rectification or erasure of your Personal Data held with Braincentre, or to restrict or object to such Personal Data’s processing, or to port such Personal Data – please contact us at [meir.krasniker@brain-centre.com](mailto:meir.krasniker@brain-centre.com).

Please note that when you ask us to exercise any of your rights under this Policy or applicable law, we may need to ask you to provide us certain credentials to make sure that you are who you claim you are, to avoid disclosure to you of personal information related to others and to ask you to provide further information to better understand the nature and scope of data that you request to access. Such additional data will then be retained by us for legal purposes (e.g. so we have proof of the identity of the person submitting the request), in accordance with Section 4 above. We may redact from the data which we will make available to you, any Personal Data relating to others.

**If you would like to make any requests or queries regarding Personal Data we process on a Customer’s behalf, please contact such Customer directly.**

## 11. Additional Information and Contact Details

**Updates and Amendments:** We may update and amend this Privacy Policy from time to time by posting an amended version on our Services. The amended version will be effective as of the date it is published. We will provide prior notice if we believe any substantial changes are involved via



any of the communication means available to us and/or on the Services. After such notice period, all amendments shall be deemed accepted by you.

**External Links:** While our Services may contain links to other websites or services, we are not responsible for their privacy practices. We encourage you to pay attention when you leave our Services for the website or application of such third-parties, and to read the privacy policies of each and every website and service you visit. This Privacy Policy applies only to our Services.

**Our Services are not designated to attract children under the age of 16:** We do not knowingly collect Personal Data from children and do not wish to do so. If we learn that a person under the age of 16 is using the Services, we will attempt to prohibit and block such use and will make all efforts to promptly delete any Personal Data stored with us with regard to such child. If you believe that we might have any such data, please contact us by e-mail at [meir.krasniker@brain-centre.com](mailto:meir.krasniker@brain-centre.com)

**Questions, Concerns or Complaints:**

If you have any comments or questions about this Privacy Policy or if you have any concerns regarding your privacy, please contact us at [meir.krasniker@brain-centre.com](mailto:meir.krasniker@brain-centre.com).