

# PRIVACY POLICY

LAST UPDATED: APRIL 24, 2017.

sPARK Parking Technologies Ltd. ("sPARK", "we", "our" or "us") respects the privacy of its users ("User(s)" or "you"). This Privacy Policy is to inform you what information we collect when you visit our website(s) at <http://parking-polly.com>, or any additional websites owned and operated by sPARK (the "Site") and when you use our downloadable mobile application (the "App"), chat bots and additional services (collectively referred to as the "Service").

Capitalized terms which are not defined herein, shall have the meaning ascribed to them in our Terms of Use available at <http://www.parking-polly.com/terms-of-use> which this Privacy Policy is incorporated thereto by reference (together, the "Terms").

BY ACCESSING THE SERVICE AND/OR USING THE SERVICE, 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 SERVICE.

## INFORMATION WE MAY COLLECT FROM OUR USERS

We may collect and record two types of data and information from relating to the usage of the Service. The first type of information is non-identifiable and anonymous information. We are not aware of the identity of the User from which we have collected the Non-Personal Information. Non-Personal Information is any unconcealed information which is available to us while Users are using the Service. Non-Personal Information which is being gathered consists of technical information and behavioral information, and may contain, among other things, the activity of the User on the Service, identity and operation system, type of mobile device, operating system and its version, screen resolution, duration of usage of the Service, User's stream of clicks during sessions of using the Service, language selected, etc.

The second type of information is individually identifiable information. This information may, in itself or taken together with additional information available to sPARK, identify an individual, or may be of a private and/or sensitive nature. Personal Information we collect includes: name, email address, phone number, your geolocation, home city, your allocated parking zones, your membership of discount clubs, special parking permits, your travel habits (such as routes, times of travel from one destination to another), your home address, office address or other favorite destinations, destinations search history on the Service, all User-generated data, your in-app settings and any additional information which you actively choose to provide.

The geolocation information we collect includes detailed location and route information, including latitude, longitude, altitude, speed, heading, form and duration of movement and other information sent by your mobile device for which the Service is installed on. sPARK uses this location, route information, parking location, and other data produced while on route, to identify parking patterns in the city, for the benefit of improving our services.

To make the most of your use of the App, we recommend you to activate your mobile device location services. You may restrict the option to collect geolocation information by choosing to opt- out of such option in your mobile device settings. In such case, please note that you will experience a decrease in the availability, quality, accuracy and efficiency of the Services;

We collect such information via your use of the Service and through information which you voluntarily provide us as further described in this Privacy Policy below, for purposes of providing the Service, enhancing the User's experience and personalizing the Service as further detailed below. In the event that you register via Facebook, Google+ or other social networks sPARK may also have access to your public profile, which includes your name, gender, age group and residency.

By registering or signing in to the app using your social network account (such as your Facebook account), you agree to provide sPARK with information (including personal information) obtained from the social networks, for the purposes provided under this Privacy Policy. In the event that you create a sPARK Account via your Facebook or Google social network account, sPARK may have access to your public profile, which includes your name, gender, email address, photo, age group and residency.

Your use of social networks to create your account is subject to the privacy policies and term of use of such third party social networks. For avoidance of doubt, any Non-Personal Information connected or linked to any Personal Information is deemed as Personal Information as long as such connection or linkage exists.

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 of the Terms.

## HOW WE USE YOUR INFORMATION

Your information is collected and processed for purposes:

- (i) to provide you with and to operate the Service, including for statistical and research purposes and creation of aggregated anonymous data;
- (ii) to personalize the Service and content provided to you, to customize your experience with the Services and to enable you to retrieve your information;
- (iii) to develop, improve and customize the Service, the experience of other users and the offering available through the Service;
- (iv) to send you updates, notices, announcements, and additional information related to the Service;

- (v) for providing you with better parking recommendations, , including amongst other: on-street navigation routes and parking lot recommendations.
- (vi) for customization and improvement of the Service's accuracy and interface;
- (vii) to use such information for sPARK's commercial purposes;
- (viii) currently we do not engage advertising in our platform, however we may also collect your information in order to display or send to you marketing and advertising material when you are using the Service, including in accordance with the section titled 'Direct Marketing' herein and
- (ix) to comply with any applicable rule or regulation.

## TRANSFERRING OR SHARING INFORMATION WITH THIRD PARTIES

sPARK will not share any Personal Information it collects with any third party, other than for the following purposes:

- (i) to satisfy any applicable law, regulation, legal process, subpoena or governmental request;
- (ii) to enforce this Privacy Policy and/or the Terms of Use, including investigation of potential violations thereof;
- (iii) to detect, prevent, or otherwise address fraud, security or technical issues;
- (iv) to protect the rights, property, or personal safety of sPARK, its Users, or the general public;
- (v) when sPARK is undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of its assets; or
- (vi) to collect, hold and/or manage your Personal Information through sPARK's authorized third party service providers, as reasonable for business purposes, which may be located in a country other than the country of your residency or location, that may not have the same data protection laws as your jurisdiction;
- (vii) cooperate with third parties for the purposes of adding operational features to the Service, enhancing and personalizing the User's experience, monetization and commercialization; or
- (viii) to authorized third party service providers solely for the purpose of providing you with the Service. For example, ordering your parking using third-party parking providers or to allow credit card payment integration.

For the avoidance of doubt, sPARK privileges the transfer, disclosure or use of non-personally identifiable information or information that is linked to anonymous random identifiers or aggregated information in an unidentifiable manner.

## DELETION OR MODIFICATION OF PERSONAL INFORMATION

sPARK retains Personal Information for such a period of time as is necessary in order for sPARK to be able to use the Personal Information for the purposes described in this Privacy Policy and for the purpose of providing its Services.

sPARK applies best practices in order not to retain personal data for a duration longer than two years.

If for any reason, you wish to modify or delete your Personal Information please contact us at: [support@sparking.co.il](mailto:support@sparking.co.il) and we will make reasonable efforts to modify anonymize or delete any such Personal Information pursuant to any applicable privacy laws.

## THIRD PARTY SERVICE PROVIDER, ADDITIONAL PARKING-RELATED SERVICES

While using the Service we may be using third party software and/or data processing services for various needs, *inter alia*, in order to collect and/or process the information detailed herein (the “**Third Party Service Provider**”). Note that these are independent software and/or service providers and sPARK 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 without limitation,

Amazon Web Services, which privacy policy is available at [https://aws.amazon.com/privacy/?nc1=f\\_pr](https://aws.amazon.com/privacy/?nc1=f_pr);

AppsFlyer, which its privacy policy is available at <https://www.appsflyer.com/privacy-policy>;

AppSee, which its privacy policy available at <https://www.appsee.com/legal/privacypolicy>;

Google products, to name a few, Google Analytics, Firebase, API.AI, Google Maps (for desktop versions), Google route transcoding and geocoding APIs, which are covered by the Google Privacy Policy available at: <https://www.google.com/policies/privacy>;

Here, for the purpose of providing the application map, which its privacy terms are available at: <https://legal.here.com/en-gb/privacy>;

Mixpanel, for purpose of gaining insights and analytics, which its privacy policy is available at: <https://mixpanel.com/privacy>;

ObjectLabs (mLabs), were we store some of our database servers, which its privacy policy is available at: <https://mlab.com/company/legal/privacy>;

TinyURL, for the purpose of shrinking down long custom links, which its privacy policy is available at: <http://tinyurl.com/privacy.php>; and

Crashlytics, for debugging of new app version, which its privacy policy is detailed at: <http://try.crashlytics.com/terms>

sPARK may also provide additional parking-related services, including on-demand parking services, provided by its third-party operational service partners (as they may evolve from time to time at sPARK's discretion). Such third-party providers' services, such as OPnGO, ([privacy policy](#)), Pango, or any other parties, all of which are subject to a respective terms of use and privacy policies.

## USE OF COOKIES

To make the Site work properly, when you visit or access our Site we use industry-wide technologies such as "cookies" (or similar technologies) in order to improve your user experience by enabling us to 'remember' you, either for the duration of your visit (using a 'session cookie') or for repeat visits (using a 'persistent cookie'). In addition, we may, in the future, use cookies in order to deliver ads relevant to you. By using or accessing our Site, you agree to our use of cookies. 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. Please note that by deleting or disabling future cookies, your user experience may be affected and you might not be able to take advantage of certain functions of our Site, therefore, your online experience may be limited.

## DIRECT MARKETING

You hereby agree that we may use your contact details for the purpose of informing you regarding new parking discounts in your area, new parking options nearby, or other parking products, which may interest you, and to send to you other marketing material, transmitted to the email address or to the mobile device. You may withdraw your consent contacting us at: [support@sparking.co.il](mailto:support@sparking.co.il) We may permit, solicit or contract certain other companies to conduct advertising campaigns on the Services.

## SECURITY

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

## CHANGES TO THE PRIVACY POLICY

The terms of this Privacy Policy will govern the use of the Service and any information collected therein. sPARK reserves the right to change this policy at any time, so please re-visit this page frequently. In the event of any substantial change of this policy, we will make reasonable efforts to post a clear notice on the Site. Such substantial changes will take effect seven (7) days after such notice was provided on our Services or sent by email. Otherwise, all other changes to this Privacy Policy are effective as of the stated "**Last Updated**" date and your continued use of the Service after the Last Updated date will constitute acceptance of, and agreement to be bound by, those changes.

## ADDITIONAL INFORMATION, PERSONAL RIGHTS AND CONTACT US

If you have any questions, comments or personal request concerning this Privacy Policy , you are welcome to send us an email at: [support@sparking.co.il](mailto:support@sparking.co.il) and we will make an effort to reply within a reasonable timeframe.

As the Data Controller, sPARK processes data for the purpose of providing the service. Limited Third Party Service Provider may also process data when necessary. According to the regulation from Israel and the European Union Data Protection Regulation, as a data subject, you have at any time the right to : obtain confirmation as to whether or not personal data concerning you are being processed, access the personal data, ask for rectification of inaccurate personal data and ask for erasure of the concerned personal data.

We inform you that some data collect and processed within the usage of the Service may be transferred outside European Union to Israel where sPARK is located. Israel is recognized by as an adequacy country regarding to the European Union Data Protection Regulation. In case of data processing made by « Third Party Service Provider » located outside European Union, please refer to each Third Party Service Provider privacy policy to learn more.

By contacting sPARK you warrant and agree that you are free to do so, and that you do not provide sPARK with information, which violate any third party intellectual rights (the "**Information**"). Without degrading from the aforesaid, all rights, including intellectual property, arising from your communication with us will be owned by sPARK and will be considered as sPARK's confidential material. It is clarified that any use of the Information, will be done in sPARK's sole discretion, and sPARK is not obligated to use all or part of this Information.