

Linnovate AI Chatbot - Privacy Policy

Last updated and effective as of April 24, 2025.

Our Commitment to Privacy

Your privacy is important to us. For better protecting your privacy we, "Linnovate-AI" by Linnovate Technologies Ltd. 514840156, a registered Israeli Company, provide this notice explaining our online information practices and the choices you can make about the way your information is collected and used. To make this notice easy to find, we make it available on our homepage and every other page of our websites.

The Data We Collect

In order to provide services to you and for additional purposes as provide below in this Privacy Policy, we may collect and process the following types of information:

Data you provide about yourself and your business - For example, when you register for our services, contact us, or use other features on our services that require input, we will store and save the information you provide. This information may include individual personally identifiable information such as your name, postal address, email address, etc.

Data you provide about your customers - This information may include individual personally identifiable information such as names of those customers, their phone numbers, their address, their emails, etc. (Both types of information shall be referred to as "**Personal Data**").

Data we collect by ourselves -

Log Data - All information sent by your web browser and computer when you visit our services may be stored by servers we use. This information may include your IP address, browser type, URL accessed, cookie information, the date and time of your request, and other information that may uniquely identify you and may also be considered as part of your Personal Data.

You are responsible for ensuring the accuracy of the Personal Data you submit to us (whether it is submitted by yourself or by your customer). Inaccurate information will affect the information you receive when we provide you with services and our ability to contact you as contemplated in this Privacy Policy as well as to provide you the services at the best manner possible.

You are the sole responsible for all consents required to be collected and obtained, according to the applicable law, from the data subjects (your contact persons and your customers). It is your responsibility to not provide the Company's services to your customer which is not providing you the required consents, or he is objecting the process of his Personal Data. For further information in this respect please see the relevant provisions in the DPA (as defined below).

Special Categories of Data - There are special categories of personal data, data which reveals or contains: racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, genetic data, biometric data, health data, sex life or sexual orientation (hereinafter: "Special Categories of Personal Data") and therefore is more sensitive.

We request that you do not provide us any Special Category of Personal Data via our services or in any other way, but it is important that you understand that part of the Personal

Data which we may collect from your customers for you, may be considered as Special Category of Personal Data, and this kind of Personal Data will be collected and be used or processed otherwise only according to an appropriate lawful basis, as further specified below, and according to the DPA (as defined below) which will be executed between us, and for the purpose of providing you the relevant services of the Company.

Without derogating from the above, you acknowledge and understand that such Special Categories of Data may be processed by us for you as part of the services we provide to you, hence it is your sole and full responsibility to obtain all **EXPLICIT CONSENTS TO THE PROCESSING OF THOSE PERSONAL DATA FROM YOUR CUSTOMERS**.

Automated individual decision-making - Profiling - The data subject (your customer) must have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her. **For that, you as our customer, must obtain explicit consent for such profiling.**

Our platform uses the conversations' content of your customers as well as meta-data and analytics collected during these conversations and may be used to perform personality and cognitive profiling of your customers. The data is used for personalizing the dialogues and offers to your customers as part of your services to your customers.

The Service may also use traffic data and other technical information (device type, log files etc.) processed by cookies and similar tracking technologies, in order to analyze the data subject's profile. Such data shall be collected and analyzed only after the data subject was duly informed about it by you, followed by an explanation on the profile assessment to be produced from such data, demonstrating why such assessment is relevant and necessary for the performance of the services provided to him by you.

In addition, please note that this Privacy Policy does not cover the following information, as it cannot be considered as Personal Data:

- Information relating to a legal entity (e.g. corporate information, corporate contact details, accounting information, etc.);
- Anonymized data, namely information which does not relate to an identified or identifiable natural person or to Personal Data rendered anonymous in such a manner that the data subject is not or no longer identifiable.

Use of Personal Data

We use the Personal Data to make our services available to you, to conduct statistical analysis, provide customer support, to undertake necessary security and identify verification checks, to meet certain business requirements, in order for us to improve the services and/or customer service and to create profiles and behavioral targeting. We may also use the Personal Data to track your use of the services and/or for other internal purposes, such as evaluating, providing, and improving the services and for any other purpose related to the operation of the services we provide you.

The Personal Data may also be used by us to provide you with marketing and promotional offers and information regarding products and services from us. If you do not wish to receive such promotional messages or calls, you may notify us at any time or follow the instructions contained in the promotional communications you receive.

We limit access to all Personal Data gathered within our organization and Personal Data is never shared to third parties, only in accordance to this Privacy Policy as further specified below.

We will process Personal Data as above-mentioned and only in accordance to the provisions of this Privacy Policy. Our personnel are obligated to maintain the security, and secrecy of any Personal Data as provided in this Privacy Policy and this obligation continues even after their engagements end.

Lawful Bases for Processing

We will only collect and process Personal Data about you where we have one of the following lawful bases, unless specifically stated otherwise in this Privacy Policy:

Consent (where you have given consent), contract (where processing is necessary for the performance of a contract with you (e.g. to deliver the services you have requested), legal obligation (to comply with a common law or statutory obligation), vital interest (to protect someone's life), public task (to perform a specific task in the public interest that is set out in law) and for legitimate interests.

Where we rely on your consent to process Personal Data, you have the right to withdraw or decline your consent at any time, and where we rely on legitimate interests, you have the right to object. If you have any questions about the lawful bases upon which we collect and use your Personal Data, please contact us at lyron@linnovate.net.

Personal Data Sharing and Transferring

Except as stated in this Privacy Policy, We do not give, sell, transfer or otherwise share any Personal Data to, or with, any third party without first advising our affected customers of this activity, except for the cases listed in this Privacy Policy.

Sharing of Personal Data may occur (i) if you have requested and/or agreed that the Personal Data will be provided to third parties; or (ii) if the disclosure is required by law; or (iii) if it is transferred for the performance of a contract between you and us; or (iv) the transfer is necessary in order to protect the vital interests of the data subject; or (v) the transfer is necessary or legally required on important public interest grounds, or for the establishment, exercise, or defense of legal claims; or (vi) if the transfer is for the purposes of the legitimate interests pursued by us or by the relevant third party.

We reserve the right to share the Personal Data with appropriate authorities and financial institutions, if we determine in our sole discretion that you attempted to defraud us, or if we suspect you are committing any fraudulent activity, or any other prohibited transaction, or if you breach the terms of use of our services.

In the event that we sell, assign or transfer some or all of our business or assets to a successor or acquirer, or if we are acquired by or merges with a third party, or if we file for bankruptcy or becomes insolvent, we may disclose, sell, assign or transfer all of your Personal Data as part of the transaction.

Transfer of Personal Data outside the EEA

The data protection and privacy laws of the jurisdictions to which the Personal Data will be transferred may not be as comprehensive as those in the European Union, in such case, we will take measures to ensure a similar level of protection is provided to your Personal Data, subject to the DPA executed between us (please see further information with respect to the DPA below in this Privacy Policy).

Data Security

To prevent unauthorized access, maintain data accuracy, and ensure the correct use of Personal Data, we have put in place physical, electronic, and managerial procedures to safeguard and secure the information we collect online. However, we cannot guarantee the security of your data, which may be compromised by unauthorized entry or use of our services.

We implemented and will maintain and follow appropriate technical and organizational measures intended to protect information that we collect against accidental, unauthorized or unlawful access, disclosure, alteration, loss, or destruction.

Security Incident Notification

If we become aware of any unlawful access to any information we stored, or unauthorized access to it, resulting in loss, disclosure, or alteration of the information, we will, according to the DPA, promptly (1) notify you of this security incident; (2) investigate this security incident and provide you with detailed information about the security incident; and (3) take reasonable steps to mitigate the effects and to minimize any damage resulting from the security incident.

Notification(s) of those security incidents will be delivered to you by any means we select subject to the DPA. It is your sole responsibility to ensure you maintain accurate contact information on the services portal. Our obligation to report or respond to such a security incident is not an acknowledgement by us of any fault or liability with respect to a security incident.

You must notify us promptly about any possible misuse of your accounts or authentication credentials or any security incident related to the services that we provide to you.

Our Commitment to Children's Privacy

Protecting the privacy of the very young is especially important. For that reason, our services are not directed towards and may not be used by children, and no part of our website is structured to attract any children. Minor who may be provisioned with access to our services shall require specific parental consent..

Links to Other Sites

Our services may contain links to other sites. Other sites may also refer to or link to our services. We are not responsible for the privacy practices or the content of such other online sites, and any information collected by these third-party online sites is not governed by

this Privacy Policy, and we assume no responsibility or liability whatsoever for the policies (including privacy policies), practices, actions or omissions of such third parties.

Retention and Deletion of Data

We may retain your Personal Data for as long as needed to provide you with the services and the uses described in this Privacy Policy, subject to your retention period policy. This often means that we will keep information for the duration of your engagement with us. Please note, however, that where applicable legislation requires us to do so, it may be required to keep records of your Information even after such termination. Upon termination of your use of the Services, and unless we require to retain such Personal Data as aforesaid, or according to any agreement or applicable laws, we shall, including upon written request by you, delete the Personal Data as soon as reasonably practicable and according to our Policies and applicable laws.

Please note that permanently deleting your account erases all of your information and after completing this process, you can no longer use any of our services, your account and all its data will be removed permanently, and we will not be able to restore your account or retrieve your data in the future. If you contact us in the future, the system will not recognize your account, and we will not be able to locate the deleted account.

How You Can Access or Correct Data

You can access and maintain much of the Personal Data that we collect online by connecting us through our contact information. To protect your privacy and security, we will also take reasonable steps to verify your identity before granting access or making corrections.

We provide registered users with the ability to correct, delete, or block their data, or make such corrections, deletions, or blockages on their behalf.

DPA and Security

For the services provided by us, we are a Processor (as defined in the General Data Protection Regulation (EU) 2016/679 ("GDPR"), acting on your behalf (registered user of our services), while you are acting as a Controller (as defined in the GDPR). As data processor, we will only act upon your instructions, and according to Data Processing Agreement that you can find below and in the following link <https://linnovate.net/ai-products-lcb-dpa/> the "DPA").

It is hereby clarify that the services provided to you are subject to your full execution and compliance with the DPA.

As data Controller, you are responsible for the security, integrity and authorized usage of your customers' Personal Data, and for obtaining all the required legal basis for processing their Personal Data according to all applicable law, and as applicable, including the GDPR.

The duration of data processing shall be for the term designated under an agreement (which refers to this Privacy Policy) between you and us. The objective of the data processing is the performance of the services and as specified above in the "Use of Personal Data" section above.

The scope and purpose of processing your data, including any Personal Data is described in this Privacy Policy.

This section do not limit or reduce any data protection commitments we make to you in a

services agreement between you and us and in this Privacy Policy.

We may engage other sub-processors in according to the provisions of the DPA.

In assessing the appropriate level of security, account shall be taken of the risks that are presented by processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data transmitted, stored or otherwise processed.

We shall take steps to ensure that any natural person acting under our authority who has access to Personal Data does not process them except on instructions from us, unless he or she is required to do so by Union law.

We shall notify you without undue delay after becoming aware of a personal data breach.

Cookies

What are Cookies?

Cookies are small text files that are placed on your computer or mobile device by websites that you visit. They are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies help us recognize your device and remember information about your visit, like your preferences, settings, and how you use our website.

How We Use Cookies

We use cookies and similar tracking technologies (like web beacons, pixels, and scripts) for a variety of purposes, including:

Essential Operations: Some cookies are strictly necessary for the operation of our service. They enable core functionality such as security, network management, accessibility, and allowing you to log into secure areas or use a shopping cart. You cannot opt-out of these cookies as the website cannot function properly without them.

Performance and Analytics: These cookies help us understand how visitors interact with our website by collecting and reporting information anonymously. We use this data to analyze traffic, see which pages are most popular, identify any issues, and improve the user experience. These are listed in the “Third Parties” section of this Privacy Policy.

Functionality: These cookies allow our website to remember choices you make (such as your user name, language, or the region you are in) and provide enhanced, more personal features. For example, they can be used to remember your login details or language preferences.

Targeting and Advertising: These cookies may be set through our site by us or our advertising partners. They may be used to build a profile of your interests and show you relevant advertisements on other sites. They do not store directly personal information but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.

Types of Cookies We Use

We may use the following types of cookies:

Session Cookies: These are temporary cookies that expire once you close your browser.

Persistent Cookies: These remain on your device for a set period specified in the cookie or until you manually delete them. They help us recognize you as a returning user.

First-Party Cookies: These are set directly by our website.

Third-Party Cookies: These are set by a domain other than the one you are visiting. This occurs, for example, when we embed content from other sites (like videos) or use third-party services for analytics or advertising. These third parties have their own privacy and cookie policies.

Your Choices and Managing Cookies

You have the right to decide whether to accept or reject cookies (except for strictly necessary cookies). You can exercise your cookie preferences in several ways:

Cookie Consent Banner/Tool: When you first visit our website, you may be presented with a banner or tool allowing you to customize your cookie preferences.

Browser Settings: Most web browsers allow you to manage your cookie settings. You can typically set your browser to refuse cookies or delete certain cookies. Please note that if you choose to block or delete cookies, some parts of our website may not function properly. You can usually find these settings in the 'options' or 'preferences' menu of your browser. Consult your browser's help documentation for specific instructions.

Third-Party Opt-Outs: For specific third-party cookies, such as those used for analytics or advertising, you may be able to opt-out directly via the third party's website or through industry opt-out programs like the Network Advertising Initiative (NAI) or the Digital Advertising Alliance (DAA).

Consent

Where legally required, we will ask for your consent before placing non-essential cookies on your device. You can withdraw your consent at any time by adjusting your cookie settings as described above or through any cookie management tool we provide. Withdrawing consent will not affect the lawfulness of processing based on consent before its withdrawal.

Third Parties

When using our services, we share information with third parties, these include the following: (i) 360dialog for the provision of messaging services; (ii) Activertrail and Twilio for the provision of SMS messages; (iii) OpenAI for AI services; (iv) Microsoft Azure; (v) Google's advertising services.

Your Rights

In certain circumstances, you have rights in relation to the Personal Data we process about you. The table below sets out an outline of those rights and how to exercise them:

Please note that we will require you to verify your identity before responding to any requests to exercise your rights. To exercise any of your rights, please email lyron@linnovate.net. Please note that for each of the rights below, We may have valid legal reasons to refuse your request, in such instances we will let you know if that is the case.

Right	Content
Access	You have the right to know whether we processes Personal Data about you, and if we do, to access Personal Data we hold about you and

Right	Content
	certain information about how we uses it and who we shares it with. You can request a copy of these Personal Data.
Portability	You have the right to receive a subset of the Personal Data you provide us in a structured, commonly used and machine-readable format and a right to request that we transfer such Personal Data to another party if we process it on the bases of (i)our contract with you or (ii) with your consent and when the processing is carried out by automated means.
Correction	If you believe that the Personal Data we holds about you are inaccurate or incomplete, you have the right to request its correction or modification.
Erasure	You may request that we erase the Personal Data we hold about you in the following circumstances: (i) where you believe it is no longer necessary for us to hold the Personal Data, (ii) we process it on the basis of your consent and you wish to withdraw your consent, (iii) we process your Personal Data on the basis of our legitimate interest and you object to such processing, (iv) you no longer wish us to use your Personal Data to send you marketing or (v) you believe we are unlawfully processing your Personal Data.
Restriction of Processing	You have a right to require us to restrict of processing the Personal Data we hold about you in the following circumstances: (i) if you dispute the accuracy of your Personal Data, (ii) if the processing is unlawful and you object to its deletion, (iii) if you believe that we are no longer need your Personal Data but that it is still necessary for you to establish, exercise or defend your legal rights or, (iv) if you have objected to our processing Personal Data we hold about you.
Objection	You have the right to object to the processing of the Personal Data we hold about you and we will consider your request. Please provide us with detail as to your reasoning so that we can assess whether there is a compelling overriding interest in our continuing to process such Personal Data or we need to process it in relation to legal claims.

Your Acceptance of this Policy

By signing up for an account or by continue using our services, you agree to this Privacy Policy, and to any changes we may make to this Privacy Policy from time to time – without the need to notify you about such changes.

Changes to This Privacy Policy

We reserve the right to alter the Privacy Policy at any time. We will post any changes to the privacy policy on this page. It is recommended that you revisit this Privacy Policy regularly so as to be kept appraised of the updated Privacy Policy. Your continued use of the services following changes to this Privacy Policy means you accept these changes. If you do not agree to the altered privacy policy, you may stop using the services.

How to Contact Us

Should you have other questions or concerns about these privacy policies and if you believe that we are not adhering to our privacy or security commitments, please send us an email to at lyron@linnovate.net