

Privacy Policy

BitLender values our users' privacy and has implemented this privacy policy to ensure that our user's privacy is maintained and protected. This online privacy policy applies to the Platform and services, as defined in our Terms and Conditions, and all related sites, applications, data storage, services and tools regardless of how you access or use them, whether through a mobile device, a computer or any other device. By requesting, accessing, or otherwise using the Platform, our services, products, features, functions, technologies, or content offered on the Platform and all related sites and applications thereto, regardless of how accessed, including by computer, mobile phone, or any other device, you accept this Privacy Policy and willfully agree to the collection and use of your Personal Information in accordance with this Privacy Policy. The "Account" in this privacy policy refers to the account established by the Primary Accountholder, through which our services and platform are provided with regard to the Primary Account and the Allowance-Account(s). The terms "Primary Account," "Primary Accountholder," "Allowance-Account" shall have the same meanings as set forth in the Terms and Conditions.

By accessing and/or using the platform in any other way, you confirm that the information you provide to us is yours, complete and accurate and was willfully provided by you. You agree to reimburse and indemnify us for any damages, losses or expenses that we or our affiliates, subsidiaries, service providers and contractors will incur due to any third parties claims, actions and/or complaints against your use or misuse of information in connection to the Platform and Services.

1. Notification Regarding Collecting and Use of Information

You are not legally obligated to provide us with any personal information, and you hereby confirm that you provide the personal information required for us to render the services, willfully and freely.

BitLender will store the information you provide us on a secured proprietary database located in EU and Or Israel. By using the Platform you hereby concede to the terms of this Privacy Policy and to our collecting, processing and sharing of your personal information for the purposes set forth herein. If you do not agree to this Privacy Policy, please do not access or otherwise use the Platform. We reserve the right, in accordance with our sole discretion, to amend this Privacy Policy from time to time. Any such amendments will be effective upon posting of the revised Privacy Policy on the website or the application, and your continued use of the Services thereafter serves as your acceptance to those changes and to the revised Privacy Policy accordingly.

Please note that portions of and/or all of the information you provide us may be disclosed to third parties in accordance to this privacy policy and as described in details in section 4 herein.

2. The Information that We Collect

When you use, visit, or otherwise interact with the Platform, you will sometimes give information directly to us or to our third-party service providers, including your name, account information, email address, mailing address, phone number, date of birth, or other Personal Information regarding yourself or the Allowance-account holder.

Additionally, when you use, visit, or otherwise interact with the Platform, we and our third-party service providers may use technological tools that store or collect information sent to us by your computer, browser, mobile phone, or other device. This information may include your IP address, unique device identifiers, or other unique identifier; your device functionality, such as the type of browser, operating system, or hardware used; your device location, which may include a street name and city or GPS-location; mobile network information; your activities within the Platform; your email address and mobile phone number; and other information that was filled in the forms on our website and Platform. When you use the Platform, we also collect information about your transactions, purchase habits and activities, including some financial and payment information. We may also obtain financial information about you from third parties, including, but not limited to, credit bureaus and identity verification services.

3. The Way We Use Personal Information We Collect

We may use your Personal Information in the following events:

- 3.1 verify your identity and recognize you when you accesses the Platform;
- 3.2 process and analyze your Account transactions and to send you notices about your Account transactions;
- 3.3 provide our Services and customer support to you;
- 3.4 deliver service update notices and promotional offers, answer questions and respond to your queries, and otherwise to communicate with you for any other purpose;
- 3.5 determine your location and the location of merchants, and to correlate your location with transaction activity for the purpose of providing you services;
- 3.6 enforce our Terms of Service and to prevent potentially prohibited, malicious or illegal activities;
- 3.7 improve the Platform and services, conduct periodical quality and safety control measures and generate reports regarding our Platform and services;
- 3.8 create new analytics, algorithms, or other tools;
- 3.9 lock and unlock your Account; and
- 3.10 advertise and market our products and services, and the products and services of our business partners, to you, including by presenting targeted advertisement and to facilitate and improve our mailing services.
- 3.11 BitLender will use the information provided by you and collected by us, in order to establish a personal credit ranking database of BitLender's users (the

Credit Rank). Without derogating from section 5 herein, the Credit Rank will not be disclosed to third parties for their commercial interests.

We reserve the right to add or remove certain ways in which we use personal information in accordance to our sole discretion. Any such amendments will be effective upon posting of the revised Privacy Policy on the website or the application, and your continued use of the Services thereafter serves as your acceptance to those changes and to the revised Privacy Policy accordingly.

4. PRIVACY OF MINORS

Since the BitLender Services are intended to be used by minors in accordance with our terms and conditions, we may collect Personally Identifiable Information **about** minor children ("Minors"). However, the information will be provided to us from users of sufficient legal age that are authorized to provide such information about the respective Minors. As such, you (as the parent or guardian) should help and advise your Minor child in using the Platform, and its terms and conditions. By using the Platform as a parent or guardian, you represent and warrant that you have sufficient legal authority to act on behalf of and represent any Minor you may add to the Primary Account and you hereby expressly consent to the collection of information about these Minors as described herein. As a parent or guardian, you consent to BitLender gathering information from the minor's use of the Platform, knowing that the Minor may inadvertently include Personal Information. Parents/guardians will be able to see what information about their Minors is stored by the Services and will be able to delete and/or modify such information at any time (including passwords) by contacting us at Info@bitlender.co.il

5. Disclosure of Personal Information

We may disclose and/or share your personal information which you willfully provided to us, to third parties in the following events:

- 5.1 if we are required to by law, warrant, court order or if you violate any or all of our Terms of Service;
- 5.2 if we receive a notice from third parties or otherwise have reasonable grounds to suspect that you used or intend to use our services to engage in or attempt to facilitate or solicit illegal, infringing, tortious, harmful or otherwise immoral activities which contradict the public policy;
- 5.3 in order to facilitate our mailing services or any other services we provide to you through sub-contractors and third parties; or
- 5.4 in the event that we are merged with or acquired by a third party, wholly or partially, and/or otherwise engage with a third party for the purpose of offering and/or selling our assets and proprietary rights.
- 5.5 Information regarding registered Allowance-Account holders, including, but not limited to, established spending parameters, pending transactions, approved purchases, and transaction history, **will be disclosed** to the Primary Account holder.

We will not share any of your Personal Information with third parties for the third parties' marketing purposes and only shares your Personal Information with third parties as described in this policy. Please note that we may share aggregated customer information with third parties for the third parties' marketing purposes, including so that we may offer you merchant promotions; such aggregated information will be anonymized and will not identify a specific individual and does not contain Personal Information.

You understand that we will not notify you in any way regarding disclosure of the information as aforementioned in this section and you irrevocably waive and forfeit any right for being notified whether prior to and/or post disclosure of the information to third parties.

You may object to the transfer of information to third parties' by contacting us at info@bitlender.co.il . Please note that portions of our Services depend on third parties and without disclosing the information to such third parties we will be unable to provide you with such Services.

We engage with third party service providers to facilitate payment methods and services to ensure proper protection of your credit and debit card data (in this section – "**payment service providers**"). The payment service provider may also store and processes your data which is encrypted through the Payment Card Industry Data Security Standard (PCI-DSS).

Although we and our payment service providers take all the necessary measures to secure and protect your credit and debit card data, no system is flawless, error free or entirely unbreachable. Without derogating from the above, you hereby understand and willfully acknowledge that we have no control over the manner of which the payment service providers use or store your credit card and payment data and you hereby waive, forfeit and relieve us from any liability, claim and/or cause of action due to data breach, leak of credit card and/or personal information and/or misuse of said information on behalf of our payment service providers or due to their actions with regards to the above mentioned in this section.

We comply with and follow cybersecurity regulations and take the necessary precautions to protect your personal information, however, we cannot guarantee the protection and security of your personal information by third parties which we disclose your information to and you hereby relieve us from any liability, waive and forfeit any claim and/or cause of action resulting from infringement, misuse, abuse, disclosure and/or damages to you or your personal information as a result of actions taken by third parties with regards to your personal information.

6. Information On How We Use Cookies

When you use the Platform, we (and in some cases, our service providers) may place "**Cookies**" (small data files, including cookies, pixel tags, and/or other local storage provided by your browser or associated applications) on your computer, browser, mobile phone, or other device. We use these technological tools to facilitate and improve the Platform and our services, including, but not limited to: recognize you as a customer; customize our Services; help ensure that your account security is not compromised; mitigate risk and prevent fraud. We use both session Cookies, which expire and no

longer have any effect when you log out of your account or close your browser, and persistent Cookies, which remain on your device until you erase them or they expire. We encode our Cookies so that we or our third-party service providers can interpret the information stored in them. You are free to decline Cookies if permitted by your computer, browser, mobile phone, or other device, although doing so may interfere with your use of the Platform.

7. Links to Other Web Sites

The Platform may contain links to other web sites and/or applications that are not owned or controlled by BitLender. These links are provided for your convenience and do not signify our endorsement of such third parties or their contents. We have no control over, do not review and are not responsible for the privacy policies of or content displayed on such other third parties' facilities. Please be aware that the terms of our Privacy Policy do not apply to any outside Platforms, websites, applications etc.

Once you leave the Platform or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our website's Terms and conditions.

8. CONTACT US

You may contact us and make inquiries regarding the information we store on you or on a minor under your natural or legal supervision. You may also contact us in order to delete certain information we store on you or on a minor under your natural or legal supervision. If you have any questions or suggestions regarding our Privacy Policy, or you wish to review the data and information we maintain on you and/or request to delete any such information in accordance to your country of residency's laws and regulations, please contact us at info@bitlender.co.il

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