

PLETHORA PRIVACY POLICY

Updated: September 23, 2020

Plethora Technologies Ltd. ("**Plethora**" "**us**", "**we**", or "**our**") is the owner and operator of <https://www.iamplethora.com/> (the "**Website**") and other products and services included therein (collectively, the "**Plethora Platform**").

We are committed to protecting your privacy. When you use the Plethora Platform, you trust us with your information. This Privacy Policy explains what information we collect when you use the Plethora Platform and how we use it and what rights you have in relation to it. Please read this Privacy Policy carefully as it will help you make informed decisions about sharing your Personal Information with us. This Privacy Policy applies to your use of the Plethora Platform, and if you do not wish to be bound by this Privacy Policy, and thereby do not consent to the collection and use of your information in accordance with it, you must cease any use of the Plethora Platform immediately. By using the Plethora Platform, you confirm that you have read, understood and agree to the collection and use of your information as we have outlined in this Privacy Policy.

This Privacy Policy is incorporated into the Plethora Terms of Use (which can be found at <https://www.iamplethora.com/policies/en/plethora-terms-of-service.pdf>) and is an integral part thereof.

1. WHAT INFORMATION DO WE COLLECT?

In order to use the Plethora Platform, we may require you or you legal guardian if you are under 18 or the age of legal competence in your territory, to provide us with certain personally identifiable information, including, but not limited to, your name, email address, and other information which may be used to identify you ("**Personal Information**"). The Personal Information that we collect may depend on the context of your interactions with us and use of the Plethora Platform. You can always refuse to supply Personal Information, however that may prevent you from using all or part of the features of the Plethora Platform.

When the Plethora Platform is used, certain data may be collected automatically and/or generated by such use, such as device and usage information, your IP address, browser and device characteristics, operating system, language preferences, referring URLs, location, information about how and when you use the Plethora Platform and other technical information ("**User Data**").

2. HOW DO WE COLLECT INFORMATION ABOUT YOU?

Information you provide to us

When you create an account and/or prior to using the Plethora Platform, we may ask you to provide us with certain Personal Information.

Personal Information may also be collected when you contact our support or send us other communication.

We may also collect Personal Information from you when you provide, upload, post, develop and create certain types of content, such as games, assignments, levels, and other creative items related to the Plethora Platform (the "**User Content**").

Information Automatically Collected

We automatically collect User Data when you use the Plethora Platform. This User Data is technical information and does not immediately reveal your identity but may include device and usage information which may be Personal Information. Such User Data may include, amongst others, your IP address, browser and device characteristics, operating system, language preferences, referring URLs, location, information about how and when you use the Plethora Platform and other technical information.

Cookies

Cookies allow a web server to transfer data to a computer for recordkeeping and other purposes. Both session and persistent cookies may be used in connection with the Plethora Platform. These cookies are used for security purposes, to facilitate navigation, to display information more effectively, and to better serve you with more tailored information, as well as for online tracking purposes. We may also use cookies to gather statistical information about the usage of the Plethora Platform in order to continually improve the design and functionality, to understand how users use the Plethora Platform, and to assist us with resolving questions regarding the Plethora Platform. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to decline the use of cookies, however some features of the Plethora Platform may not work properly if you decline the use of cookies.

Google Analytics

We may use Google Analytics to help us analyze how visitors use the Plethora Platform. Google Analytics uses cookies to collect information about the number of visitors to the Plethora Platform, the webpage that referred visitors to the Plethora Platform, and the pages that visitors view within the Plethora Platform. To opt out of being tracked by Google Analytics, visit: <https://chrome.google.com/webstore/detail/google-analytics-opt-out/flloajicojecljbmefodhfapmkgbcbnh?hl=en>.

Pixel Tags, Web Beacons, Clear GIFs or other Similar Technologies

The Plethora Platform may use other technologies, among other things, to track the actions of Plethora Platform users, measure the success of our communications and compile statistics about Plethora Platform usage.

3. HOW DO WE USE YOUR DATA?

We use the information we collect (including Personal Information and/or User Data) for the following purposes:

- To facilitate your use of the Plethora Platform and to respond to your inquiries, solve any potential issues you might have with the use of the Plethora Platform and for other legitimate business purposes. Our “legitimate business purposes” may include, amongst others, creating and/or managing user profiles, personalized website content and communications based on your preferences, meeting contract or legal obligations, resolving disputes and enforcing the Terms.
- If you choose to link your account with us to a third party account (such as your Google or Facebook account), we use the data you allow us to collect from those third parties to facilitate account creation and the logon process.
- We may use User Data to send you information regarding the Plethora Platform and changes thereto, as well as information about changes to our terms, conditions, and policies.
- To enforce and/or protect our rights, property and safety of our users or any other person or entity.
- In order to comply with and in order to assess compliance with applicable laws, rules and regulations, and internal policies and procedures.
- To conduct analysis required to detect malicious data and understand how this may affect the user and/or our IT system, for statistical monitoring and analysis of current attacks on devices and systems and for the on-going adaptation of the solutions provided to secure devices and systems against attacks.
- For ongoing review and improvement of the Plethora Platform to ensure it is user friendly and to prevent any potential disruptions, to understand feedback on the Plethora Platform, for in-depth threat analysis, and to develop new products and services.
- We may use IP addresses for purposes such as calculating Plethora Platform usage levels, helping diagnose server problems, and administering the Plethora Platform. Please note that we treat IP addresses, server log files and related information as non-Personal Information, except where we are required to do otherwise under applicable law.

4. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

We may share information we collect (including Personal Information and/or User Data), for the purposes provided herein, and as follows:

- If you have given us specific consent.
- If you have received access to the Plethora Platform through a school, extracurricular activity operator, other educational entity or organization and/or an authorized reseller of the Plethora Platform (each an "**Institution**"), such Institution may be granted access to your Personal Information and User Data.

- If we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process.
- If we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved, all in accordance with applicable law.
- With service providers and vendors for the purposes of providing services to us (for example, accountants, IT and communications providers and debt collectors). Examples include payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Plethora Platform, which will enable them to collect data about how you interact with the Plethora Platform over time. This information may be used to, among other things, to analyze and track data, determine the popularity of certain content and better understand user activity.
- If we sell our business or assets, we may need to disclose our users Personal Information and User Data to the prospective buyer for due diligence purposes. We may also share information with parent, subsidiaries and affiliates, and investors of ours primarily for business and operational purposes.
- User Content provided by you may be presented on the Plethora Platform and may be shared with third parties.
- User Data that has been aggregated in a manner that cannot be reasonably used to identify you may be shared with third parties.

5. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION AND USER DATA?

We may keep and use your Personal Information and User Data for as long as necessary for the uses specified herein, and we may also keep and use your Personal Information and User Data as we may need to comply with our legal obligations, resolve disputes, and enforce contractual rights. Note however we do not assume any obligation to store any information or data on the Plethora Platform and retain our right to delete any Personal Information and/or User Data. You may, however, ask that we delete certain data, as further detailed in Section 10 below.

6. HOW DO WE PROTECT YOUR PERSONAL INFORMATION AND USER DATA?

We implement what we deem as commercially reasonable technical and administrative security measures designed to protect the security of your Personal Information and User Data. Although we will do our best to protect your Personal Information and User Data, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, transmission of Personal Information and User Data to and from the Plethora Platform is at your own risk. You should only access the Plethora Platform within a secure environment. If you feel

that the security of your Personal Information or User Data may have been compromised, please immediately notify us at hello@iamplethora.com.

7. CROSS-BORDER TRANSFER

We may transfer Personal Information and User Data to locations outside of your country. Your Personal Information and User Data may be stored with server hosting and backup service providers. You consent to the transfer of information to countries outside of your country of residence (such as Israel and the USA), which may have different data protection rules than in your country.

8. THIRD PARTY POLICIES

This Privacy Policy does not address, and we are not responsible for, the privacy practices of any third parties, including any third party operating any site to which the Plethora Platform contains a link. The inclusion of a link on the Plethora Platform does not imply our endorsement of the linked site.

Credit card processing and/or other billing in connection with your use of the Plethora Platform may be handled by third parties retained to manage such processes. Your use of such services may be subject to the terms of service and privacy policy of such third parties.

You are required to review the terms of use and privacy policies of such third parties.

9. INFORMATION OF CHILDREN?

We do not knowingly collect data from children under the age of 18, unless they have obtained the consent of their parent and/or legal guardian, or any other consent required under applicable law to do so. By using the Plethora Platform, you represent that you are at least 18, or that you are the parent, or the legal guardian, or the person who is permitted under applicable law to consent to this Privacy Policy. If we learn that Personal Information from a user under the age of 18 has been collected, without the consent of their parent or legal guardian, or the person who is permitted under applicable law to provide such consent, we may deactivate the account and take reasonable measures to promptly delete such Personal Information from our records. If you become aware of any Personal Information we have collected from children under the age permitted in your jurisdiction, please contact us at hello@iamplethora.com.

10. WHAT CAN YOU DO ABOUT THE INFORMATION WE COLLECT?

- Right of access: you have the right to request a copy of the information that we hold which pertains to you.
- Right of rectification: you have the right to correct data that is inaccurate or incomplete.
- Right to be forgotten: in certain circumstances, you can ask us to erase any Personal Information stored about you.
- Right of portability: You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

- Right to restrict processing: you can request us to limit the way we use Personal Information.
- Right to object: you have the right to challenge certain types of processing we do.
- Rights related to automated decision-making including profiling: you can ask us to provide you with a copy of its automated processing activities if you believe the data is being processed unlawfully.
- If you are unable to perform these actions yourself using the Plethora Platform, please contact us at hello@iamplethora.com.

Plethora will respect and assist you in your realization and implementation of any of the above requests, as well as any further rights you may be entitled to under applicable law, however as a result, your continued use of the Plethora Platform may be restricted or terminated entirely.

11. DO WE UPDATE THIS POLICY?

This Privacy Policy is effective as of the date set forth above. We may update and modify this Privacy Policy from time to time. Any such modification of this Privacy Policy will be effective immediately upon notice to you (or if otherwise stated in the notice), which notice may be provided by notice to you using any of the contact details you may have provided, and/or uploading the amended Terms on the Plethora Platform, so please be sure to review the Privacy Policy uploaded to the Plethora Platform periodically.

12. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have any questions or concerns about this Policy, our handling of your Personal Information and User Data or if you believe your right to privacy has been violated, you may email us at hello@iamplethora.com, and we will make commercially reasonable efforts to respond.